

**Flight Standards Service (AFS)
Whistleblower Report
American Airlines
File# EWB15504**

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ASO CMO-67 Investigation Team

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Whistleblower Investigation American Airlines
File #: EWB15504

I. Executive Summary

The Investigation Team examined the Whistleblower Complaint received by the Federal Aviation Administration Office of Audit and Evaluation (AAE) from six (6) employees of American Airlines (AALA025A). The employees alleged safety violations or noncompliance with FAA Orders, Regulations, and Standards. An investigation was initiated as to the following allegations:

1. Mechanics pressured to deviate from proper maintenance procedures.
2. Mechanics pressured to not write up identified discrepancies/deficiencies.
3. Aircraft with radome damage that exceeded limitations was repaired without issuance of an appropriate Field Engineering Authorization and returned to service.

The Investigation Team was able to substantiate all of the allegations. Detailed evidence has been provided to sustain each of the allegations and Enforcement Investigation Reports (EIR's) have been initiated against AALA, concerning each of the allegations.

II. Methodology

The Investigation Team reviewed the following information, which was provided in the initial Whistleblower Complaint:

- Complaint to the United States Department of Labor initiated by the initial six (6) Complainant's against American Airlines as the Respondent.
(IOP 1: U.S. Department of Labor Complaint)
- United States Bankruptcy Court Chapter 11 AMR Corporation, Case Number 11-15463 Settlement Agreement with the Federal Aviation Administration
(IOP 2: United States Bankruptcy Court Chapter 11 AMR Corporation, Settlement Agreement with the Federal Aviation Administration)
- In Accordance With Policy (IAW) from the Maintenance and Engineering (M&E), Communications, Transport Workers Union (TWU)
(IOP 3: In Accordance With Policy (IAW) from the Transport Workers Union (TWU))
- Critical Behaviors from the M&E, Communications, TWU
(IOP 4: Critical Behaviors from the TWU)
- American Airlines Letter dated July 9, 2013, concerning Just Policy to all M&E Personnel signed by the Vice Presidents of Line Maintenance Operations, Base Maintenance Operations, Engineering Performance & Quality Assurance and Safety & Operations Performance.
(IOP 5: American Airlines Just Policy Letter dated July 9, 2013)

The initial Whistleblower Complaint Investigation focused on the information received from the original six (6) complainants' through interviews and the referral to documentation, which would support their allegations.

(IOP 6 through 11: Interviews with Chicago Mechanic Complainants)

The Investigation Team requested, received and reviewed hundreds of documents obtained from American Airlines. The documents consisted primarily of:

- American Airlines Aircraft Maintenance Manuals (AMM)
- American Airlines General Procedures Manuals (GPM)
- American Airlines Maintenance Task Cards
- American Airlines Log Books
- American Airlines Non-Routine Cards (E58)
- American Airlines Field Engineering Authorizations (FEA's)
- American Airlines Aircraft Damage Logs (ADL's)
- American Airlines Repair Documents (AARD)
- American Airlines Structural Repair Manuals (SRM)
- American Airlines Illustrated Parts Catalogs (IPC)
- American Airlines Aircraft History Reports
- American Airlines Service Check Documents
- American Airlines Aircraft Routing Reports
- American Airlines Aircraft Flight Reports

The Investigation Team's information review, statements obtained from the original six (6) complainants' and the in-depth research of all documents received by AALA led to the following additional interviews:

- Twenty (20) AALA Chicago (ORD) Mechanic Personnel
(IOP 12 through 31: Interviews with Chicago Maintenance Technicians)
- Three (3) AALA ORD Management Personnel
(IOP 32 through 34: Interviews with Chicago Maintenance Supervisors / Managers)
- Eight (8) AALA Dallas - Fort Worth (DFW) Mechanic Personnel.
(IOP 35 through 42: Interviews with Dallas Fort-Worth Maintenance Technicians)
- One (1) AALA Miami (MIA) Mechanic Personnel
(IOP 43: Interview with Miami Maintenance Technician)
- One (1) AALA TWU President
(IOP 44: Interview with TWU President - Local 591)
- One (1) FAA Inspector – AMR CMO
(IOP 45: Interview with FAA CMO-AMR PPM)

III. Additional Background

American Airlines (AALA) signed a settlement agreement with the Federal Aviation Administration (FAA), which was adjudicated through the United States Bankruptcy Court under Chapter 11, Case Number 11-15463, on May 8, 2013.

The FAA agreed to the monetary amount of the settlement, because of AALA's recent, current, and planned remedial efforts, including specifically AALA's agreement to perform the Commitments and to accomplish additional industry best practices.

AALA further agreed to advance its maintenance processes and procedures in particular to require maintenance personnel to sign off maintenance tasks "In Accordance With" Approved Technical Documentation within one year of the effective date of the Settlement Agreement, provide "In Accordance With" Training to all current AALA Maintenance and Engineering (M&E) personnel within one year of the effective date of the Settlement Agreement.

(IOP 2: United States Bankruptcy Court Chapter 11 AMR Corporation, Settlement Agreement with the Federal Aviation Administration)

The Investigation Team confirmed that AALA did accomplish and establish the required “In Accordance With” Policy (IAW) and trained all Mechanics, Supervisors and Managers in the following areas:

- In Accordance With (IAW) and Maintenance Control
- Just Policy
- Critical Behaviors
- Just Culture
 - (IOP 53: AALA Personnel Trained)
 - (IOP 54: AALA IAW Tech Ops Bulletin G-15-10)
 - (IOP 55: AALA Just Policy for Maintenance Errors and Violations)
 - (IOP 56: AALA Training Course Critical Behaviors Track #: 2623 Employees)
 - (IOP 57: AALA Critical Behaviors List)
 - (IOP 58: AALA Training Course Critical Behaviors Track #: 2623 Managers)
 - (IOP 59: AALA Training Course Just Policy Awareness Track #: 2528 Managers)
 - (IOP 60: AALA Training Course Just Culture Track #: Y1118 Managers)
 - (IOP 61: AALA Critical Behaviors for Level 5-8 Track#: T2626)

The Investigation Team found that of the Aviation Maintenance Technician (AMT’s) interviewed the “IAW Policy” had initially resulted in an increase of safety through adherence and reference to specified maintenance procedures, but has also resulted in an increase of time for aircraft to be inspected and returned to service, which led to delays and flight cancellations.

The AMT’s conveyed that AALA Management’ recourse has been to pressure mechanics to deviate from defined maintenance procedures or to not write up identified discrepancies/deficiencies, addressed in AALA Maintenance Program and Supported by their “IAW Policy”. The AMT’s expressed that the pressures placed on them, by AALA Management, has created a culture that is not conducive to safe operations and in doing so, un-airworthy aircraft or aircraft not meeting its type design have been released into the National Airspace System (NAS), and thereby safety has been compromised.

The Investigation Team found that the pressures in which the AMT’s expressed varied in content and scope. *Pressure is the burden of physical or mental distress; the weight of social or economic imposition.*¹ As related by each of the AMT’s, they were pressured to deviate from proper maintenance procedures and/or pressured to not write up identified discrepancies/deficiencies manifested itself through direct, indirect, implied, inferred or was even alluded to. The fact that the AMT’s may or may not have succumb to the pressures would only be an outcome; which does not change the fact that they have provided evidence in which they were pressured by a variety of means.

¹ Merriam-Webster Dictionary /www.merriam-webster.com/dictionary/pressure

IV. Allegations and Findings

Overview of Complainant's Allegations from Whistleblower EWB15504

1. **Allegation:** Mechanics pressured to deviate from proper maintenance procedures.

Finding: Substantiated.

The Investigation Team substantiated the allegation where mechanics were pressured by American Airlines Management to deviate from proper maintenance procedures, as required by Federal Aviation Regulations and supported by their IAW Policy related to the events described below:

1. On or about October 7 or 8, 2014, FAA Inspector Tim Kohls from the AMR CMO and American Airlines Compliant Specialist Lars Romme were approached by Union Representative Joe Marshall and Crew Chief William Carpenter concerning lightning strikes and the Lightning Strike Inspection Card 05-96-03. A Note on this Card states:

This card is to be used in the event of an inbound pilot report of a lightning strike or a confirmed ground strike. All other conditions are addressed in the SRM/AARD.

(IOP 46: AALA Lightning Strike or Static Discharge – Conditional Check Card Number 05-96-03 dated 11-05-14)

Inspector Kohls stated the interpretation of the Note was, *"If you think you have lightning strike damage, then you should do a lightning strike inspection."*

(IOP 6: William Carpenter - Interview Chicago Mechanic – Complainant)

(IOP 45: Tim Kohls FAA Inspector - Interview)

Later that evening, Inspector Kohls attended a meeting with the Night Shift Supervisors, who also questioned Inspector Kohls concerning the Lightning Strike Inspection Card. In the meeting were Compliant Specialist Lars Romme and two other Supervisors. This was the first opportunity Inspector Kohls had to actually view Card 05-96-03. Inspector Kohls stated he did not think the "Note" was reason to not comply with a Lightning Strike Inspection after maintenance had discovered possible Lightning Strike Damage. This interpretation by FAA Inspector Kohls was in direct opposition to the interpretation by American Airlines Management and Supervisors during the evening meeting.

(IOP 45 Tim Kohls FAA Inspector - Interview)

American Airlines Chicago Compliant Specialist Lars Romme stated the Note for the Lightning Strike Inspection Card 05-96-03 means *"Must be witnessed by ground personnel."*

(IOP 32: Lars Romme – Interview Chicago Compliant Specialist Management)

Crew Chief Carpenter has identified the following:

- The next evening, Regional Director Evita Rodriguez pressured Mechanics to deviate from proper maintenance procedures during a Crew Chief Meeting by her actions and statements. Crew Chief Carpenter alleged Regional Director Rodriguez stated, *"Inspector Kohls had been disciplined and should not be talking to us. He should not have been giving out advice on how we operate our business and company"*

(IOP 6: William Carpenter - Interview Chicago Mechanic – Complainant)

That same day, Manager Joe Travieso discussed the interpretation given by Inspector Kohls with Mechanic James Larson.

Mechanic Larson identified the following:

- Manager Joe Travieso pressured Mechanic Larson to deviate from proper maintenance procedures by his actions and statements. Mechanic Larson alleged Manager Travieso stated the following, *"Inspector Kohls had been disciplined and you should not be talking to him. He should not have been giving out advice on how we operate our business and company"* When asked by Mechanic Larson where he had obtained that information, Manager Travieso stated he had received the information from Regional Director Rodriguez.
(IOP 7: James Larson - Interview Chicago Mechanic – Complainant)

Inspector Kohls was never disciplined for giving his opinion concerning the Lightning Strike Inspection Card 05-96-03. The AMR CMO has taken action and filed an EIR against American Airlines removing the Note, so as to assure Lightning Strike Inspections were being complied with anytime maintenance discovered evidence of Lightning Strike Damage.²

(IOP 45: Tim Kohls FAA Inspector - Interview)

The Note was removed as of January 30, 2015 from Card 05-96-03.

(IOP 46: AALA Lightning Strike or Static Discharge – Conditional Check Card Number 05-96-03 dated 01/30/2015)

2. On October 10, 2014, in ORD a Boeing 777-223 Aircraft, Registration Number N792AN, Ship Number 7BA, was being pressed into service for an international flight, because the original aircraft had to be removed from service. While taxiing, the mechanics had difficulty with steering the aircraft utilizing the tiller. After arrival at the terminal, an inspection revealed, that an oil soaked rope was intertwined in the nose wheel steering cables. A Maintenance Discrepancy was recorded on AALA Log Page 13410870, Item # 51.

(IOP 15: Scott Holler - Interview Chicago Mechanic)

(IOP 47: AALA Log Page 13410870, Item # 51 Discrepancies and Action Taken)

Mechanic Mike (Frank) Biesterfield was assigned to perform the corrective actions. Upon arrival at the aircraft Manager Paul Irvin was standing on the nose wheel and pulling oil soaked rope from the cables.

Mechanic Mike (Frank) Biesterfield identified the following:

- Prior to this event, Manager Paul Irvin had pressured Mechanic Biesterfield to deviate from proper maintenance procedures by his actions and statements. Mechanic Biesterfield alleged Manager Irvin stated, *"If you do not comply with my directives, the result would not be good for you, because you do not want to be like those guys."* This comment was a direct reference to the six (6) Mechanics (Whistleblower Complainants), who alleged they had been removed from their work area and relegated to other duties for writing up too many discrepancies, which delayed or cancelled flights.

² EIR 2015SW210038-Lightning Strike Work Cards 05-96-03

Mechanic Biesterfield was also aware that Managers had and would retaliate by putting you on oil crew for the week or make you the bus driver to shuttle crews all shift so you cannot look at aircraft. Mechanic Biesterfield stated, *"On hangar nights, they will put you on park crew for 4 or 5 nights in a row for finding too much wrong with the aircraft."*

(IOP 19: Mike (Frank) Biesterfield - Interview Chicago Mechanic)

- Manager Paul Irvin pressured Mechanic Biesterfield to deviate from proper maintenance procedures, by his actions and statements during the maintenance process. Manager Irvin was constantly pushing Mechanic Biesterfield to get the aircraft fixed, and scrutinized every step of the process. Mechanic Biesterfield was utilizing AALA AMM Task 32-51-00-720-802. Manager Irvin suggested they skip procedures. Mechanic Biesterfield admitted only certain sections were completed and the portion of the check they went through everything checked okay. No ICAS message. Mechanic Biesterfield alleged Manager Irvin stated, *"That is all you need to do"*, which resulted in stopping at subtask 720-002.

Required by AALA Maintenance Program and Supported by their IAW Policy, Task AALA AMM 32-51-00-720-802, was required to be completed in its entirety. Mechanic Biesterfield affirmed he did not complete the full maintenance procedure and returned the aircraft to service, due to exerted pressure from Management. Action taken of the worked performed was recorded on AALA Log Page 13410870 Item # 51.

(IOP 19: Mike (Frank) Biesterfield - Interview Chicago Mechanic)

(IOP: 40 AALA AMM B-777 Task -32-51-00-720-802: Nose Landing Gear Steering System Functional Test)

(IOP 47: AALA Log Page 13410870, Item # 51 Discrepancies and Action Taken)

Boeing 777-223 Aircraft, Registration Number N792AN, Ship Number 7BA, was immediately placed into revenue service for the International flight, which had been delayed for over two (2) hours. During the takeoff roll and prior to rotation, the Captain aborted the takeoff, because of a Nose Steering Configuration Warning. The aircraft returned to the terminal and the discrepancy was recorded on AALA Log Page 13088121, Item # 86.

(IOP 48: AALA Log Page 13088121, Item # 86 Discrepancies and Action Taken)

Mechanic Darius Vanea was assigned and accomplished and recorded the corrective action per Task AALA AMM 32-53-02, as directed in AALA Maintenance Program and Supported by their IAW Policy on AALA Log Page 13088121, Item # 86. The aircraft was returned to service.

(IOP 48: AALA Log Page 13088121, Item # 86 Discrepancies and Action Taken)

(IOP 23: Darius Vanea - Interview Chicago Mechanic)

If Task AALA AMM 32-51-00-720-802 would have been completed in its entirety, the remaining procedures may have identified the Nose Steering Configuration was not in tolerance. By dispatching this aircraft, without completing the entire task as required by AALA's Maintenance Program and supported by their IAW Policy, American Airlines compromised safety.^{3 4 5}

³ ASAP ID 1579/1202 filed by Mike (Frank) Biesterfield on October 10, 2014 – Closed

⁴ EIR Number: 2015SO670012 filed against American Airlines

(IOP 49: AALA AMM B-777 Task -32-51-00-720-802: Nose Landing Gear Steering System Functional Test)

3. On August 6, 2014, Boeing 737-823, Aircraft Number N973AN, Ship Number 3DF, had a discrepancy of a damaged wing panel. A Maintenance Discrepancy was recorded on AALA Log Page 13086375, Item #09. Mechanic James Larson was assigned to perform the corrective actions. The determination was made that Non-Destructive Testing (NDT) would be needed IAW Boeing 737 SRM, prior to repairing the damaged panel. Mechanic Larson was in the process of obtaining a FEA.
(IOP 50: AALA Log Page 13086375, Item # 09 Discrepancies and Action Taken)

Mechanic Larson identified the following:

- Manager Paul Irvin pressured Mechanic Larson to deviate from proper maintenance procedures by his actions and statements. Mechanic Larson alleged Manger Irvin made the following statements:
 1. *"You do not need a FEA!"* Mechanic Larson inquired if Manager Irvin had reviewed the Maintenance Manual procedures that required NDT prior to repairing the damaged panel.
 2. *"I glanced at them and you need to get out there right now and finish that aircraft!"* Mechanic Larson repeated that NDT would be needed.
 3. *"Go home right now!"*

Manager Irvin rescinded his order for Mechanic Larson to go home. Eventually FEA Number B737-53-036138 was issued and the discrepancy was completed by another mechanic.

(IOP 7: James Larson - Interview Chicago Mechanic – Complainant)

(IOP 51: AALA FEA Number B737-53-036138)

4. On January 7, 2014, Boeing 777, Aircraft Number N783AN, Ship Number 7AP, needed to be taxied from the Hangar to the Terminal for reposition of an International flight. The noted fuel levels were inadequate for hydraulic cooling during taxi.

Mechanics Leo Cicerelli and Celso Sanchez computed the required fuel levels and determined they were 1300 pounds short of the 7303 pounds as required by American Airlines Boeing 777 – 200 Ground Handling Aircraft Checklist for hydraulic cooling. Mechanics Cicerelli and Sanchez ordered fuel. The fuel truck arrived approximately two (2) hours later.

(IOP 52: AALA B-777-200 Ground Handling Checklist)

(IOP 71: Celso Sanchez - Interview Chicago Mechanic)

About the same time as the fuel truck arrived, so did a Goldhofer Taxi Crew with Regional Director Evita Rodriquez. Regional Director Rodriquez had the Goldhofer hooked up to the aircraft and cancelled the fuel request. Mechanic Sanchez discussed with Regional Director Rodriquez as to the fuel requirements per the checklist. Regional Director Rodriquez was concerned about the flight being cancelled.

Mechanic Celso Sanchez identified the following:

- Regional Director Evita Rodriquez pressured Mechanics Cicerelli and Sanchez to deviate from proper maintenance procedures by her actions and statements.

⁵ EIR Number: 2015SO670042 filed against Manager Paul Irvin

Mechanics Sanchez stated he and Mechanic Cicerelli alleged Regional Director Rodriguez stated the following:

1. *"I own this decision to proceed against the checklist requirements."*
2. *"I do not understand the fuel requirements for hydraulic cooling."*
3. *"I own this situation and take full responsibility."*

Mechanic Sanchez stated he and Mechanic Cicerelli voiced their concerns as to the decision by Regional Director Rodriguez to have the aircraft towed without following the checklist and in doing so the possibility of damage and/or failures to the hydraulic system and components. The aircraft was towed from the Hangar to the Terminal.

(IOP 71: Celso Sanchez - Interview Chicago Mechanic)

(IOP 31: Joe Marshall – Interview Chicago Mechanic)

When the aircraft was towed, without adhering to the requirements as required by American Airlines Boeing 777 – 200 Ground Handling Aircraft Checklist and supported by their IAW Policy, American Airlines compromised safety.^{6 7}

⁶ EIR Number: 2015SO670043 filed against American Airlines

⁷ EIR Number: 2015SO670044 filed against Regional Director Evita Rodriguez

2. **Allegation:** Mechanics pressured to not write up identified discrepancies/deficiencies.

Finding: Substantiated.

The Investigation Team substantiated the allegation where mechanics were pressured by American Airlines Management to not write up identified discrepancies/deficiencies, as required by Federal Aviation Regulations and supported by their IAW Policy related to the events described below:

1. On September 5, 2014, a meeting was held by Regional Director Evita Rodriquez. In this meeting were Manager Rich Cygan, Mechanic James Larson and Mechanic Bella Mohapp.

Mechanics Larson and Mohapp identified the following:

- Regional Director Rodriquez pressured and threatened Mechanics Larson and Mohapp to not write up identified discrepancies/deficiencies by her actions and statements. Mechanics Larson and Mohapp alleged Regional Director Rodriquez stated, *"I know what you are doing. You need to stop this; I need my aircraft to fly in the morning. If this behavior continues, (finding discrepancies on aircraft) Corporate will make a decision about you and Chicago."*
(IOP 7: James Larson - Interview Chicago Mechanic – Complainant)
(IOP 9: Bella Mohapp - Interview Chicago Mechanic – Complainant)
- Regional Director Rodriquez pressured Mechanics Larson and Mohapp to not write up identified discrepancies/deficiencies by her actions and statements. Mechanics Larson and Mohapp alleged Regional Director Rodriquez stated, *"You need to strike a balance between safety and productivity. When I was stationed in JFK, I signed for sumping the Airbus, yet I never did. I am looking for that balance."*
(IOP 7: James Larson - Interview Chicago Mechanic – Complainant)
(IOP 9: Bella Mohapp - Interview Chicago Mechanic – Complainant)

2. On September 26, 2014, a Boeing 737, Aircraft, Registration Number N861NN, Ship Number 3GS, during a PS Check – Non Routines, Item # 10, Mechanic Joel Hastings noted a discrepancy as a lightning strike which entered on the left hand side of aircraft and exited/ blow-out on the right hand engine thrust reverser.
(IOP 52: AALA PS Card –Non Routine, Item # 10)

Mechanic Joel Hastings identified the following:

- Manager Joe Travieso pressured Mechanic Hastings to not write up identified discrepancies/deficiencies by his actions and statements. Mechanic Hastings alleged Manager Travieso stated, *"Why would you write up a Lightning Strike if you did not see 3GS get struck by lightning?"* The following witnessed the exchange between Mechanic Hastings and Manager Travieso: Crew Chief's William Carpenter, Jeff Grimm and Union Stewards Brian Cyone and Mark Smejkal.
(IOP 46: AALA Lightning Strike or Static Discharge – Conditional Check Card Number 05-96-03 dated 11-05-14)

Mechanic Hastings stated, *"Management has interpreted the Lightning Strike Card 05-96-03 to mean that if damage was found due to lightning strike and it was not confirmed by pilot report, then my obligation was only to repair damage per AARD and not find more."*

(IOP 8: Joel Hastings - Interview Chicago Mechanic – Complainant)

When aircraft 3GS arrived at the Maintenance Hangar, the Card was voided and a FEA was issued. No Lightning Strike Inspection was completed.^{8 9}

(IOP 41: AALA PS Card –Non Routine, Item # 10)

- Mechanic Hastings was brought up on a 29F Hearing as to why he pulled the MCM Card 05-96-03 and added to the workload. During the meeting, Manager Treviso questioned Mechanic Hastings. Mechanic Hastings alleged Manager Travieso asked, *“Why do feel you have the authority to assign and accomplish Lightning Strike Card 05-96-03?”*

(IOP 8: Joel Hastings - Interview Chicago Mechanic – Complainant)

- On 11/10/14, Manager Treviso again informed Mechanic Hastings they would have another discussion concerning 3GS. Manager Travieso continued with his questioning, when Union Steward Coyne informed Manager Treviso that this was bordering on harassment.

(IOP 8: Joel Hastings - Interview Chicago Mechanic – Complainant)

3. On August 18, 2014, a meeting was held with the Terminal Night Shift. Present at the meeting were Crew Chiefs William Carpenter, Pat Harmon and Mechanic Tom Krainer.

Crew Chief William Carpenter and Tom Krainer identified the following:

- Supervisor Gary Vanderhill pressured Mechanic Krainer and Crew Chiefs Carpenter and Harmon to not write up identified discrepancies/deficiencies by his actions and statements. Crew Chief Carpenter and Krainer were pushed by Supervisor Vanderhill to make deadlines. Crew Chief Carpenter and Krainer alleged Supervisor Vanderhill stated, *“I don't know what you guys think you are doing, you guys cannot win, they have more money than you do. You guys will ruin it for yourselves; you will end up like Northwest Airlines. You can be replaced.”* Supervisor Vanderhill accused the Mechanics write-ups were Bull-Shit. According to Crew Chief Carpenter, the Northwest comment was that we would all lose their jobs and American Airlines would outsource maintenance.

(IOP 6: William Carpenter - Interview Chicago Mechanic – Complainant)

(IOP 20: Tom Krainer - Interview Chicago Mechanic)

4. From August 4, 2014, through August 11, 2014, four (4) Boeing 737 Aircraft were identified with contamination within the electrical wiring by Mechanic Ted Kosecki.

Crew Chief William Carpenter contacted Mechanic Ted Kosecki concerning an American Airlines Management teleconference regarding the recent number of aircraft out of service. Manager Scott Adams described the events which took place during the teleconference to Crew Chief Carpenter.

⁸ ASAP filed by Mechanic Joel Hastings on September 26, 2014 – None ID Number

⁹ EIR Number: 2015SO670033 filed against American Airlines

Crew Chief William Carpenter and Mechanic Ted Kosecki identified the following:

- Manager Scott Adams pressured Crew Chief William Carpenter and Mechanic Ted Kosecki to not write up identified discrepancies/deficiencies by his actions and statements. Crew Chief Carpenter alleged Manager Scott Adams stated, *"American Airlines Vice President of Maintenance wanted to know who the hell this guy was writing up EWIS, and instructed us to put a stop to him immediately."* Vice President Wroble further stated, *"If this catches on, then none of the 737's will fly."* Crew Chief Carpenter also alleged Manager Adams stated there were four (4) Mechanics who were identified as "Rogue Mechanics."

(IOP 6: William Carpenter - Interview Chicago Mechanic – Complainant)

(IOP 11: Thaddeus Kosecki - Interview Chicago Mechanic – Complainant)

- Supervisor Gary Vanderhill pressured Mechanic Kosecki to not write up identified discrepancies/deficiencies by his actions and statements. Mechanic Kosecki alleged that Supervisor Vanderhill warned him when he stated, *"Due to the increase in airplanes out of service arising from the terminal mechanic's write-ups, American Airlines might shut down or reduce the Chicago Maintenance Station."* Mechanic Kosecki further alleged Supervisor Vanderhill warned him that American Airlines Vice President of Line Maintenance Paul Wroble was upset about the airplanes out of service in Chicago and he is the guy that took down the Unions at Northwest Airlines.

(IOP 11: Thaddeus Kosecki - Interview Chicago Mechanic – Complainant)

5. Between the dates of September 18, 2014, through September 25, 2014, nine (9) ORD Mechanics were systematically selected and removed by Management from their Terminal Line Station and directed to the Maintenance Hangar to work on a DC-9-82, Registration Number N492AA, Ship Number 492.

The Line Station Mechanics who were directed to work on Aircraft 492 were: Mechanics James Larson, William Carpenter, Joel Hastings, Bela Mohapp, Edward Tosado, Ted Kosecki, Thomas Ceplecha, Brain Friedman and Jeffery Pankiewicz (The Mechanics).

(IOP 6: William Carpenter - Interview Chicago Mechanic – Complainant)

(IOP 7: James Larson - Interview Chicago Mechanic – Complainant)

(IOP 8: Joel Hastings - Interview Chicago Mechanic – Complainant)

(IOP 9: Bela Mohapp - Interview Chicago Mechanic – Complainant)

(IOP 10: Edward Tosado - Interview Chicago Mechanic – Complainant)

(IOP 11: Ted Kosecki - Interview Chicago Mechanic – Complainant)

(IOP 14: Thomas Ceplecha - Interview Chicago Mechanic)

(IOP 25: Brian Freidman - Interview Chicago Mechanic)

(IOP 72: Jeffery Pankiewicz - Interview Chicago Mechanic)

Prior to the events, which unfolded between the dates of September 18, 2014, through September 25, 2014, the following was the norm:

- Assignments had always come from the Crew Chiefs, unless the Crew Chiefs were unavailable. (Union Agreement)
- Labor Loans were done when the Terminal was short of Mechanics or the Hangar was short of Mechanics. Never a direct swap of one for one.

The Mechanics identified the following:

- American Airlines Corporate Culture changed with entrance of the New Management (U.S Air) from the merger. The New Management feels they have no ownership of the IAW Policy (U.S. Air did not agree to the Settlement) have not supported the IAW Policy, and have abandoned the IAW Policy. Management wants productivity, and the IAW Policy (Safety) hampers this; thus the inception of the pressures.
- American Airlines Vice President of Maintenance Paul Wroble, Regional Director Evita Rodriguez, Managers Rich Cygan, Jack Smith and Supervisor Greg Joslyn through their actions and statements pressured The Mechanics and set an example for all the other ORD Mechanics to not write up identified discrepancies/deficiencies, because The Mechanics wrote up too many discrepancies or found too many deficiencies, which caused aircraft delays or cancellations.
- The actions and Statements by Supervisors and Managers for The Mechanics to be removed from their Terminal Line Station to The Hangar and assigned to aircraft 492 had a twofold effect. The two effects were direct pressure on The Mechanics and Indirect Pressure on all the other ORD Mechanics.
 - Direct pressure was applied to The Mechanics through intimidation and retaliation for writing up too many discrepancies or identifying too many deficiencies by following the IAW Policy, which took more time to complete action items which caused delays or cancellations by following the IAW Policy. This set the stage and placed pressure for American Airlines Mechanics to not write up identified discrepancies/deficiencies.
 - The Mechanics believed they were going to be terminated.
 - The Mechanics felt they were being set up for failure.
 - Indirect Pressure was applied to all of the other ORD Mechanics to question themselves as to how many discrepancies should or should not be identified or to not write up discrepancies/ deficiencies and if they needed to follow the IAW Policy so as not to end up as one of The Mechanics. This set the stage and placed pressure for American Airlines Mechanics to not write up identified discrepancies/deficiencies.

(IOP 6: William Carpenter - Interview Chicago Mechanic – Complainant)

(IOP 7: James Larson - Interview Chicago Mechanic – Complainant)

(IOP 8: Joel Hastings - Interview Chicago Mechanic – Complainant)

(IOP 9: Bela Mohapp - Interview Chicago Mechanic – Complainant)

(IOP 10: Edward Tosado - Interview Chicago Mechanic – Complainant)

(IOP 11: Ted Kosecki - Interview Chicago Mechanic – Complainant)

(IOP 14: Thomas Cepelch - Interview Chicago Mechanic)

(IOP 25: Brian Freidman- Interview Chicago Mechanic)

(IOP 72: Jeffery Pankiewicz - Interview Chicago Mechanic)

Mechanic Bella Mohapp identified the following:

- On September 18, 2014, Supervisor Greg Joslyn pressured Mechanic Mohapp to not write up identified discrepancies/deficiencies by his actions and statements.
 - When he handed out the assignments to the Mechanics.
 - When Mechanic Mohapp asked Supervisor Joslyn why they were being assigned to 492? Mechanic Mohapp alleged Supervisor Joslyn stated, “I cannot say.”

(IOP 9: Bela Mohapp - Interview Chicago Mechanic – Complainant)

Mechanic Edward Tosado identified the following:

- On September 18, 2014, Manager Jack Smith pressured Mechanic Tosado to not write up identified discrepancies/deficiencies by his actions and statements:
 - When Mechanics Tosado and Steve Losos asked, who was the person that ordered the assignment to Aircraft 492? Mechanic Tosado alleged Manager Smith stated, *"Who do you think?"*

(IOP 10: Edward Tosado - Interview Chicago Mechanic – Complainant)

Mechanic Ted Kosecki identified the following:

- On September 19, 2014, Station Manager Rich Cygan and Supervisor Jose Carrera pressured Mechanic Mohapp to not write up identified discrepancies/deficiencies by their actions and statements. Mechanic Kosecki alleged Manager Cygan instructed and stated:
 - For Supervisor Carrera to inform which Mechanics who would be assigned to work on 492.
 - "Seniority did not matter."
 - "This was for operational needs."

Never in Mechanic Kosecki's twenty-one (21) years with American Airlines has he ever seen a Line Station Manager in the Routing Office directing Supervisors to assign work to selected Mechanics. Even though Management was claiming operational needs, the aircraft had been sitting there all day long.

(IOP 11: Ted Kosecki - Interview Chicago Mechanic – Complainant)

- On September 19, 2014, Manager Jack Smith pressured Mechanic Kosecki to not write up identified discrepancies/deficiencies by his actions and statements. Mechanic Kosecki alleged the following conversation took place:

Mechanic Kosecki: *"Why am I being singled out for the assignment to aircraft 492?"*

Manager Smith: *"You are not the only one being singled out."*

Mechanic Kosecki: *"Okay, then the group of us are being singled out to come down and work this aircraft at the hangar. What I do not understand is why I'm a part of this, because I haven't had an airplane go out of service for a while."*

Manager Smith: *"Because of your maintenance writ-ups in the past."*

Mechanic Kosecki: *"I am doing what the company had trained me to do and go by LAW and now I am being harassed"*

Manager Smith: *"Smirked and laughed."*

Mechanic Kosecki was convinced that American Airlines was doing this to him for writing up too many discrepancies.

(IOP 11: Ted Kosecki - Interview Chicago Mechanic – Complainant)

Mechanic Edward Tosado identified the following:

- On September 19, 2014, Crew Chief Skinner pressured Mechanic Kosecki to not write up identified discrepancies/deficiencies by his actions and statements. Mechanic Tosado alleged the following discussion took place:
 - Crew Chief Skinner: *"You are not on the list anymore."*

Mechanic Tosado: *"What List are you talking about?"*
 Crew Chief Skinner: *"I talked to Manager Joslyn and he agreed you should have never been on the list."*
 Mechanic Tosado: *"Why is management doing this to us?"*
 Crew Chief Skinner: *"Look at it his way, would you want to have four aircraft out of service or one? Some of these items you guys have written up are petty."*
 Present during this conversation was Mechanic Mark Burkinshaw.
 (IOP 10: Edward Tosado - Interview Chicago Mechanic – Complainant)

Mechanic Bella Mohapp identified the following:

- On September 19, 2014, Manager Jack Smith pressured Mechanic Mohapp to not write up identified discrepancies/deficiencies through his actions and statements. Mechanic Mohapp alleged when he asked the reason for their assignment, Manager Smith stated, *"This was a management decision above my head, and goes back to the meeting with Evita Rodriquez. You need to watch your back or you could be terminated"*.
 (IOP 9: Bela Mohapp - Interview Chicago Mechanic – Complainant)

Mechanic Edward Tosado identified the following:

- On September 19 and 20, 2014, Line Station Manager Rich Cygan pressured Mechanic Tosado to not write up identified discrepancies/deficiencies, by his actions and statements:
 - When Mechanic Tosado asked why they were being singled out? Mechanic Tosado alleged Line Station Cygan stated, *"This is what Management has decided to do."*
 - When Mechanic Tosado asked Manager Cygan what was the purpose of this assignment? Mechanic Tosado alleged Line Station Cygan stated, *"This is what you have to do."*

Mechanic Tosado felt harassed and intimidated by Line Station Manager Cyan.
 (IOP 10: Edward Tosado - Interview Chicago Mechanic – Complainant)

Mechanic Ted Kosecki identified the following:

- On September 20, 2014, Technical Crew Chief Larry Carlton pressured Mechanic Kosecki to not write up identified discrepancies/deficiencies by his actions and statements:
 - When Technical Crew Chief Carlton told Mechanic Kosecki he had overheard a conversation between Manager Cygan and Technical Crew Chief Skinner that Vice President of Maintenance Paul Wroble was in Chicago.
 - When mechanic Kosecki alleged Technical Crew Chief Carlton stated, *"They have plans for you guys if you do not get this accomplished and as your friend I highly suggest to get the aircraft done."*

Mechanic Kosecki began to become sick, could not think straight and thought he would be out of a job because he wrote up discrepancies.

Vice President of Maintenance Paul Wroble, Regional Director Evita Rodriquez and Manager Rich Cygan did show up at Aircraft 492 on the night of September 20, 2014, while The Mechanics were working on the aircraft. The Managers

stayed in front of aircraft 492 for approximately 15 minutes before departing the Maintenance Hangar.

(IOP 11: Ted Kosecki - Interview Chicago Mechanic – Complainant)

Mechanic Joel Hastings identified the following:

- On September 21, 2014, Line Station Manager Rich Cygan pressured Mechanic Tosado to not write up identified discrepancies/deficiencies, by his actions and statements:
 - When Mechanic Hastings asked Line Station Manager Cygan why they were assigned to Aircraft 492? Mechanic Hastings alleged Line Station Manager Cygan's first response was, *"For contractual reasons."*
 - When Mechanic Hastings pressed for further information from Line Station Manager Cygan. Mechanic Hastings alleged Manger Cygan stated, *"I have a terminal operation that needs aircraft in service and able to go out on time, that is why you are in the hangar."*

Mechanic Hastings took this statement by Manager Cygan to mean, by putting him at the hangar, he would not be doing checks at the terminal and that way he was not putting aircraft out of service.

(IOP 8: Joel Hastings - Interview Chicago Mechanic – Complainant)

The Mechanics identified the following:

- Subsequent to the events which took place between the dates of September 18, 2014, through September 25, 2014, Management, through their actions and statements, continue to pressure The Mechanics to not write up identified discrepancies/deficiencies:
- Because most of The Mechanics are still being isolated from conducting inspections of aircraft, by being placed on the Lube Crew, Tires and Breaks Crew and/or sweeping the hangar floor.
- When the direct assignments are being received by American Airlines Management to limit their exposure to aircraft maintenance, which may lead to identifying too many discrepancies/deficiencies.

(IOP 6: William Carpenter - Interview Chicago Mechanic – Complainant)

(IOP 7: James Larson - Interview Chicago Mechanic – Complainant)

(IOP 8: Joel Hastings - Interview Chicago Mechanic – Complainant)

(IOP 9: Bela Mohapp - Interview Chicago Mechanic – Complainant)

(IOP 10: Edward Tosado - Interview Chicago Mechanic – Complainant)

(IOP 11: Ted Kosecki - Interview Chicago Mechanic – Complainant)

(IOP 14: Thomas Cepelcha- Interview Chicago Mechanic)

(IOP 25: Brian Freidman- Interview Chicago Mechanic)

(IOP 72: Jeffery Pankiewicz - Interview Chicago Mechanic)

3. **Allegation:** Aircraft with Radome damage that exceeded limitations was repaired without issuance of an appropriate Field Engineering Authorization then returned to service.

Finding: Substantiated.

The Investigation Team substantiated the allegation an aircraft with radome damage that exceeded limitations was repaired without issuance of an appropriate Field Engineering Authorization (FEA) then returned to service.

The FEA issued was found to be deficient as to:

- Addressing the extent of the damage
- Process and Procedures as required for issuing a FEA

Because the FEA was not generated IAW American Airlines Procedures Manual, the aircraft was returned to service not meeting its Type Design.

On September 13, 2014, a Boeing 737-823 Aircraft, Registration Number N889NN, Ship Number 3HX was being inspected per a routine AALA B-737 Periodic Service Check (PS) Log Page 12852773.

(IOP 62: AALA B-737 Periodic Service Check (PS) Log Page 12852773)

Mechanic Phillip Wyka discovered, recorded and attached the following discrepancy on the AALA Non-Routines to the PS Check Card, 0909 Item #1.

- Item #1: *Radome is eroded to the fiber glass on the top along the Lightning Diverter Strip.*

(IOP 63: AALA PS Check – Non Routines, Card 0909 Item # 1)

Mechanic Wyka stated to Crew Chief Carpenter the damage to the Radome was to both sides of the Diverter Strip at the 12 o'clock position. The damage to the left side of the Radome extended into the fiberglass structure of the Radome. Crew Chief Carpenter verified this when he inspected the Radome and found glass fibers visibly sticking out of the erosion damage and the different piles of the fiberglass could be felt. Upon further research by Crew Chief Carpenter and Mechanic Wyka they determined the damage exceeded the limits for a temporary repair of a tape application due to fibers showing and beyond the maximum 1.0 square inch area, per the 737 SRM 53-10-72-1A-1.

(IOP 6: William Carpenter - Interview Chicago Mechanic – Complainant)

(IOP 13: Phillip Wyka- Interview Chicago Mechanic)

(IOP 64: AALA 737 SRM 53-10-72-1A-1)

Crew Chief Carpenter notified Supervisor Jose Cabrea that the radome exceeded SRM limitations and needed a FEA. An ORD Engineer after viewing the damage held a telecom with a TUL Engineer, Supervisor Cabrea and Mechanic Wyka. The ORD Engineer was instructing the TUL Engineer to state in the FEA that the damage was erosion and that tape could be applied and let it fly. Mechanic Wyka commented the FEA needed to state that there are fibers showing on the Radome and the area affected was larger than 1.0 square inch, which was the maximum amount allowed per the SRM.

(IOP 13: Phillip Wyka- Interview Chicago Mechanic)

Upon arrival of the FEA, Crew Chief Carpenter informed Supervisor Cabrera that the FEA issued did not meet the requirements of a FEA in that it did not list the damage measurements or even state that the damage was out of limits, and the only action required was to *"apply tape similar to the SRM"*.

(IOP 65: AALA Field Engineering Authorization FEA 17645)

(IOP 6: William Carpenter - Interview Chicago Mechanic – Complainant)

To address this issue of the FEA did not meet the requirements, a conference was held between Crew Chief Carpenter, Engineer William McFadden, Manager Jim Jurewicz and Supervisor Cabrera. Crew chief Carpenter alleged Engineer McFadden stated, *"If you do not like the FEA, then you can file an ASAP report. We give you as vague a FEA as possible, so you guys can sign off what you want."*

(IOP 6: William Carpenter - Interview Chicago Mechanic – Complainant)

The aircraft was turned over to the Day Shift Mechanic Charles Allen was assigned to perform the corrective actions as per the American Airlines FEA # 17645 concerning the discrepancy.

Mechanic Allen researched SRM 53-10-72-1A, which allowed the use of tape that was similar to the type of tape that should be used. Mechanic Allen questioned Manager Jurewicz as to why the FEA was necessary, when the SRM allowed for the application of tape for erosion damage? Manager Jurewicz ordered Mechanic Allen to just go out and do it. Mechanic Allen recorded on the Non-Routines attached to the PS Check Card, 0909 Item #1 the following Corrective Actions:

- *Applied Mylar tape over eroded area on top lightning diverter strip per FEA 17645 ok for service.*

(IOP 64: AALA SRM 53-10-72-1A Nose Radome Allowable Damage)

(IOP 16: Charles Wayne Allen- Interview Chicago Mechanic)

(IOP 63: AALA PS Check – Non Routines, Card 0909 Item # 1)

The Investigation Team examined the appropriateness of the American Airlines FEA, by analyzing the information received through the statements, and references used to substantiate the deviation from the SRM approved repair.

The following discrepancies for the American Airlines FEA were noted:

- The "Title" of the FEA describes the damage as *"radome damage under diverter"* The Non Routine, FEA "Description" and Mechanic's statement described the damage as *"along both sides of the diverter strip"*.
This description of the damage does not meet the requirements of Engineering Procedures Manual (EPM) Section 05.02.2, Item (A) (5), and (B) (1) (a) in that the logbook damage description is not the same.
(IOP 66: AALA EPM 05.02)
(IOP 6: William Carpenter - Interview Chicago Mechanic – Complainant)
(IOP 13: Phillip Wyka- Interview Chicago Mechanic)
- The "Manufactures Part Number" Block lists the Radome Part Number as 284A1801-4. The Engineer used NORDAM WeatherMASTER Radome CMM 53-53-01 R1 as substantiating data for the temporary repair. This Component Maintenance Manual (CMM) is for Part Number 1001002.

This reference does not meet the requirements of Engineering Procedures Manual (EPM) Section 05.02.2, Item (A) (4) and (B) (1) (b) in that this FEA reference is not applicable to this Radome.

(IOP 66: AALA EPM 05.02)

(IOP 67: NORDAM CMM 53-53-01-R1)

- The Engineer used NORDAM WeatherMASTER CMM 53-53-01 R1 as supporting data which stated, *"CMM has no limits on paint damage to the Radome."* The CMM, page 404, item 3) sub item d) lists paint erosion over an area larger than 3 inches in diameter as major damage that must be repaired before any further flight.

This reference does not meet the requirements of Engineering Procedures Manual (EPM) Section 05.02.2, Item (A) (4) and (B) (1) (b) in that the reference documentation must be thoroughly reviewed for content.

(IOP 66: AALA EPM 05.02)

- The Engineer stated in the FEA that *"Per the inspection no anomalies were found on the radome"* which negated the inspection findings of the authorized, qualified, and Certificated Mechanics who stated, *"The damage was beyond SRM limits for this temporary repair."*

The Engineer's statement does not meet the requirements of Engineering Procedures Manual (EPM) Section 05.02.2, Item (A) (5), and (B) (1) (a) in that the Engineers documented damage is not what was stated during the phone conversation, AMS, or the actual written logbook discrepancy.

(IOP 66: AALA EPM 05.02)

(IOP 6: William Carpenter - Interview Chicago Mechanic – Complainant)

(IOP 13: Phillip Wyka- Interview Chicago Mechanic)

(IOP 70: AALA Request for Engineering Assistance AMS)

- The Engineer marked the block in the FEA "follow-up action required?" as *"No"*. Section (F) of the FEA has follow-up action required. This reference does not meet the requirements of Engineering Procedures Manual (EPM) Section 04.43 in that the Engineer has made conflicting comments as to follow-up actions.

(IOP 68: AALA EPM 04.43)

- The Engineer documented the extent of the damage as *"less than 1.5 inches thick and 18 inches long"*. Nowhere in the Non Routine Entry, Mechanic Statement, nor the Request for Engineering Assistance (AMS) Message, is the extent of the damage given as being measured by an authorized, qualified, and Certificated Mechanic. There is no documentation where those measurements originated from.

The damage is also not documented on the FEA In Accordance With the approved SRM 53-10-72-1A, section 2 (A) requirements to find the length, width and depth of the damage, not the *"thickness and length"* as written in the FEA.

This statement does not meet the requirements of Engineering Procedures Manual (EPM) Section 05.02.2, Item (A) (5), and (B) (1) (a) in that the Engineers documented damage is not what was stated in the phone conversation, AMS, or the actual written logbook discrepancy.

(IOP 69: SRM 53-10-72-1A, Section 2 (A))

(IOP 6: William Carpenter - Interview Chicago Mechanic – Complainant)

(IOP 13: Phillip Wyka- Interview Chicago Mechanic)

(IOP 70: AALA Request for Engineering Assistance AMS)

- The Engineer follow-up action in FEA 17645, Section F is to “*Repaint or replace radome within five days*”.

In Section 5 of the Substantiation the Engineer wrote, “*The five day change time will allow the aircraft to position to a station with a replacement radome*”.

These statements do not meet the requirements of Engineering Procedures Manual (EPM) Section 05.02, (b)(1)(d)(4), which requires follow on action to be specific as practicable to the nature of the final repairs.

(IOP 66: AALA EPM 05.02)
- The FEA, in its entirety, does not meet the requirements of the Engineering Procedures Manual (EPM) Section 05.02.2, Item (A) (9) (b) (e) (NOTE).

FEA’s are used to authorize methods, techniques and practices that are not covered in American Airlines, TC Holder, OEM Technical Data Manuals, or Unique Repair Instructions.

The Engineer reiterated the same procedure as stated in the SRM Reference, when in fact FEA’s are used to authorize methods, techniques and practices that are not covered in American Airlines, TC Holder, OEM Technical Data Manuals, or Unique Repair Instructions.

(IOP 66: AALA EPM 05.02)

The aircraft was returned to revenue service without the issuance of an appropriate FEA, as required by American Airlines Maintenance Program and Supported by their IAW Policy, and in doing such compromised safety.^{10 11}

¹⁰ EIR Number 2015SO670013, was filed against American Airlines

¹¹ EIR Number 2015SO670019, was filed against Manager Jim Jurewicz

V. Additional Information

1. Interviews:

a. Chicago, Illinois (ORD) Based Mechanics:

The Investigation Team interviewed twenty-six (26) mechanics, based at the American Airlines ORD Facility. The American Airlines ORD Based Mechanics were interviewed from all three (3) shifts, which included Terminal Line and Hangar.

The American Airlines ORD Mechanics stated the culture of the company has changed within the past eighteen (18) months, and has intensified in the past six (6) months in regard to maintenance procedures and practices related to safety violations or noncompliance with an FAA Order, Regulation, and Standards.

The American Airlines ORD Mechanics stated they have been pressured by American Airlines Management to deviate from proper maintenance procedures and/or to not write up identified discrepancies/deficiencies. The mechanics further stated that disciplinary actions taken against other mechanics (the original six (6) complainants') by AALA Management has sent a clear message that if you write up too many discrepancies, you will be disciplined. Some even stated they have been threatened, retaliated against and/or received disciplinary actions by AALA Management for writing up too many discrepancies or refusing to sign off maintenance that would place an aircraft into revenue service that is either un-airworthy or does not meet its type design.

(IOP 6 through IOP 31: Interviews American Airlines ORD Mechanics)

b. Dallas Fort Worth, Texas (DFW) Based Mechanics:

The Investigation Team followed leads from interviews conducted at American Airlines ORD Facility, as well as, in-depth review of American Airlines Documentation, directed the investigation to include interviews to be conducted for American Airlines DFW Based Mechanics. Eight (8) American Airlines DFW Based Mechanics were interviewed.

The American Airlines DFW Mechanics stated the culture of the company has changed within the past eighteen (18) months, and has intensified in the past six (6) months in regard to maintenance procedures and practices related to safety violations or noncompliance with an FAA Order, Regulation, and Standards.

The American Airlines DFW Mechanics stated they have been pressured by American Airlines Management to deviate from proper maintenance procedures and/or to not write up identified discrepancies/deficiencies. The mechanics further stated that they had threatened, retaliated and/or received disciplinary actions by American Airlines Management for writing up too many discrepancies or refusing to sign off maintenance that would place an aircraft into revenue service that is either un-airworthy or does not meet its type design.

(IOP 35 through 42: Interviews American Airlines DFW Mechanics)

The Investigation Team has also received information that an Aviation Investment and Reform Act (AIR21) has been filed by a DFW Based Mechanic.

The Investigation Team has received requests from other American Airlines DFW Based Mechanics to be interviewed by the FAA to offer information and present evidence that they have been pressured by American Airlines Management to deviate from proper maintenance procedures, and/or to not write up identified discrepancies/deficiencies or refusing to sign off maintenance that would place an aircraft into revenue service that is un-airworthy and/or does not meet its type design.

The Investigation Team has not interviewed these additional DFW Mechanics.

c. Tulsa, Oklahoma (TUL) Based Engineers:

The Investigation Team followed leads from interviews conducted at American Airlines ORD Facility and the American Airlines DFW Facility, as well as, in-depth review of American Airlines Documentation, directed the investigation to include interviews that would be conducted for five (5) American Airlines TUL Based Engineers.

On December 2 and 3, 2014, the Investigation Team was present at the American Airlines TUL Facility. Interviews were arranged with engineers, however on the day that the interviews were to be conducted, Upper Management of American Airlines directed all Engineers from the American Airlines TUL Facility to a meeting in DFW.

The interviews were scheduled to determine if the American Airlines TUL Based Engineers had been providing un-acceptable data to support a requested FEA. Interviews were to ascertain and validate that FEA's were written as vague as possible, so Mechanics can sign off what they want.

d. New York City, New York (JFK) Based Mechanics:

The Investigation Team has received information and evidence from American Airlines JFK Mechanics, who have stated they have been pressured by AALA Management to deviate from proper maintenance procedures and/or to not write up identified discrepancies/deficiencies.

The American Airlines JFK Mechanics further stated that they have been threatened, retaliated and/or received disciplinary actions by American Airlines Management for writing up too many discrepancies or refusing to sign off maintenance that would place an aircraft into revenue service that is un-airworthy or does not meet its type design. These American Airlines JFK Mechanics have further stated they have evidence to present to substantiate their allegations.

The Investigation Team has not interviewed any American Airlines JFK Mechanics.

e. Chicago, Illinois (ORD) Based Managers and Supervisors:

The Investigation Team followed leads from interviews with the American Airlines ORD Mechanics, as well as, in-depth review of American Airlines Documentation, directed the investigation to include interviews to be conducted

for American Airlines ORD Managers and Supervisors. Eighteen (18) American Airlines ORD Supervisors and Managers were identified to be interviewed.

Upon presentation of the list of American Airlines ORD Supervisors and Managers to be interviewed, the Investigation Team met resistance from American Airlines A Upper Management. The following demands were made by American Airlines Upper Management, if the interviews were to proceed concerning the American Airlines ORD Supervisors and Managers:

1. Interviews were not to be conducted on American Airlines Property and an Off Site location would be determined.
2. Upper American Airlines Management from the DFW Corporate Office would be present during each of the Interviews.
3. American Airlines Attorneys would be present during each of the Interviews.

The terms were rejected by the Investigation Team and the matter was referred to FAA Legal Counsel. A complete briefing was conducted between the Investigation Team Lead, and FAA Legal Counsel.

A decision was reached between FAA Legal Counsel, and American Airlines Attorneys and Upper Management. The following terms were agreed to:

1. Outside Independent Law Firm Attorney would be hired by American Airlines.
2. The Attorney would be present in the Interviews with American Airlines ORD Managers.
3. The Attorney's presence was only for clarification of the questions being asked by the FAA Investigators.

The Investigation Team requested from FAA Legal Counsel that a FAA Legal Representative be present during the interviews. The final decision was to initiate the interviews and determine if the proceedings were progressing as agreed upon by both parties. If the Investigation Team deemed the proceedings were not progressing because of the presence of the American Airlines Independent Attorney, then the interviews were to be concluded and such reported to the FAA Legal Counsel.

The Interviews of the American Airlines ORD Managers were concluded after three (3) Interviews.

(IOP 32: [REDACTED] - Interview Chicago [REDACTED])
(IOP 33: [REDACTED] - Interview Chicago [REDACTED])
(IOP 34: [REDACTED] - Interview Chicago [REDACTED])

The Investigation Team Reported the following information concerning the presence of the Independent American Airlines Attorney to FAA Legal Counsel:

¹² (IOP 33: [REDACTED] - Interview Chicago [REDACTED]) (Note: File Lost due to Computer Virus)

1. The Attorney instructed the American Airlines Manager on how to answer the question or would talk privately with the Manager on qualification of an answer given.
2. The American Airlines Attorney would interrupt the flow of the line of questioning.
3. The American Airlines Attorney wrote everything that was stated in the meeting, including each question and the response by the Manager.
4. The American Airlines Attorney would stop the interview in order to have the Investigator restate the question so as to adequately capture in the notes, not for clarification of the question for the Manager.
5. The American Airlines Attorney reviewed with the Manager the responses given and encouraged changes to the answers.
6. The American Airlines Attorney would not allow the Manager to sign the interview statement, even after careful review by the Investigators and Manager as to quality and content.
7. The American Airlines Attorney advised the Investigators that American Airlines Upper Management would have to give their permission before the ORD Managers could sign their statements.
8. The American Airlines Attorney stated that only after reviewing the questions and answers with American Airlines Upper Management would the Managers be allowed to return and sign their statement.
9. The American Airlines Attorney stated that since the interviews took two (2) hours to conduct that the Managers were too tired and needed rest before reviewing their statements.

FAA Legal Counsel made the decision to suspend the interviews and advised the Investigation Team other avenues would be sought to garner the information needed from the American Airlines ORD Managers.

2. Enforcement Actions concerning AALA Maintenance Policies and Practices:

The Investigation Team, during the Whistleblower Investigation, acquired evidence to pursue additional Enforcement Actions against American Airlines, which are directly correlated to the allegations. The following EIR's have been initiated and currently open.

- a. Allegation: Mechanics pressured to deviate from identified proper maintenance procedures
 1. AALA released B-737 N973AN into service. Inappropriate FEA-No data supporting extending limitations.¹³
 2. AALA released B-737, N971AN into service without correcting defined discrepancy multiple cracks. FEA 17649.¹⁴
 3. AALA Manager caused the release of a B-737, N787AL into service without repairing right engine acoustical panel.¹⁵
- b. Allegation: Mechanics pressured to not write up identified discrepancies/deficiencies.
 1. AALA released B-737, N946NN into service without performing required Lightning Strike Inspection.¹⁶
 2. AALA Manager caused the release of a B-737, N946NN into service without performing required Lightning Strike Inspection.¹⁷

¹³ EIR Number 2015SO670022, was filed against American Airlines

¹⁴ EIR Number 2015SO670028, was filed against American Airlines

¹⁵ EIR Number 2015SO670036, was filed against [REDACTED] American Airlines

¹⁶ EIR Number 2015SO670014, was filed against American Airlines

3. AALA released B-737-832, N954AN into service without performing required Lightning Strike Inspection.¹⁸
 4. AALA released B-737-832, N956AN into service without performing required Lightning Strike Inspection.¹⁹
- c. Allegation: Issuance of an appropriate Field Authorization.
(Note: The Original Allegation covered one aircraft identified as being repaired without issuance of an appropriate Field Engineering Authorization. The Investigation Team found other incidents which involved aircraft identified as being repaired without issuance of an appropriate field authorization.)
1. AALA released DC-9-83, N599AA into service with an Inappropriate FEA 16227R1- concerning a Service Bulletin Clamp.²⁰
 2. AALA released DC-9-82, N7520A into service with an Inappropriate FEA 17780 Doubler and pressure Test Not Accomplished.²¹

VI. Conclusions and Recommendations:

American Airlines Safety Culture has changed since the signing of the Settlement Agreement with the FAA on May 8, 2013. The change has been one of meeting the Letter of the Agreement, but not the Intent of the Agreement. American Airlines has failed to perform to the standards of the commitments agreed to within the settlement agreement.

American Airlines Mechanics were pressured through the burden of mental distress and by having the weight of social or economic imposition placed upon them. The Mechanics were pressured to deviate from proper maintenance procedures and /or to not write up identified discrepancies/deficiencies.

Effective communications between American Airlines Management and Mechanics have eroded, and trust has become a factor. Shift turnovers concerning aircraft with discrepancies /deficiencies are not being properly addressed.

The outcome of the pressures are having a direct effect on safety in which aircraft have been released into the NAS in an Un-Airworthy Condition or not meeting its Type Design.

The Investigation Team therefore submits the following Recommendations:

1. AFS 1 to inform [REDACTED] the FAA's concern of the Safety Culture change within American Airlines, which is affecting safety.
2. FAA to address with American Airlines Upper and Middle Management on pressures being applied to Mechanics.
3. FAA to require American Airlines to have training for all Managers, Supervisors and Mechanics concerning effective communications regarding aircraft maintenance continuity during shift turnover.

¹⁷ EIR Number 2015SO670018, was filed against [REDACTED] American Airlines

¹⁸ EIR Number 2015SO670031, was filed against American Airlines

¹⁹ EIR Number 2015SO670032, was filed against American Airlines

²⁰ EIR Number 2015SO670024, was filed against American Airlines

²¹ EIR Number 2015SO670030, was filed against American Airlines

4. FAA to require American Airlines to submit a methodology for ensuring that every aircraft with evidence of a lightning strike and aircraft records, which documents Lightning Strike Damage, to be identified.
5. FAA to require American Airlines to complete a full Lightning Strike Inspection for every aircraft identified based on the results, garnered from their FAA Accepted Methodology.
6. FAA to require American Airlines to incorporate the FAA Accepted Methodology, within their Approved Maintenance Program. The Methodology must be conclusive as to what defines a confirmed lightning strike.
7. FAA to require American Airlines to address the deficiencies of their FEA process through a records research and to coordinate any and all changes with the FAA.