

UNITED STATES GOVERNMENT

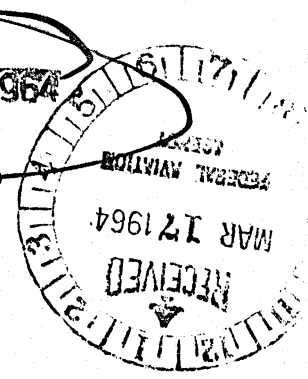
# Memorandum

cc. 205  
260  
LAX-200

FEDERAL AVIATION AGENCY

DATE: MAR 13 1964

In reply refer to: FS-60



SUBJECT: Special Evaluation of the Western Region Air Carrier Branch

FROM : Director, Flight Standards Service

TO : Director, Western Region

In accordance with your request an evaluation team has been formed and will arrive in Los Angeles by noon Monday, March 16, as discussed in our recent conversation. A copy of my memorandum to the Chief, Evaluation Staff, is enclosed for your information.

The team is composed of the following personnel:

- Team leader - Browning Adams, Acting Chief, Evaluation Staff
- Raymond C. Matthews - Evaluation Staff
- Seth J. Converse - Evaluation Staff
- Charles S. Brower - Maintenance Division
- James M. Leslie - Operations Division

The exact itinerary will be determined after the team meets with you and Mr. Krieger. It is anticipated that no more than two weeks will be necessary for this project.

We hope this review of the Air Carrier programs will be mutually beneficial and accomplish its intended objective.

*George S. Moore*  
George S. Moore, FS-1

Enclosure

*W. E. MA - 200*

SPECIAL EVALUATION

AIR CARRIER PROGRAMS IN  
THE WESTERN REGION

March 16-27, 1964

Prepared by:  
Evaluation Staff  
Flight Standards Service

APR 23 1964

PREFACE

The Western Region has responsibility for a substantial number of air carriers and commercial operators. Recent occurrences involving air carriers prompted the Director of the Western Region to discuss the air carrier programs with the Administrator and to request the Director of Flight Standards Service to conduct a special evaluation of the air carrier programs and the Western Region's management of these programs. The objective of this evaluation was to determine weaknesses in the air carrier programs or the management of these programs that permit situations to develop which result in accidents or incidents.

To achieve this objective, the Evaluation Team interviewed Western Region personnel associated with the management and execution of air carrier programs and reviewed pertinent records and files.

*Browning Adams.*

Browning Adams  
Acting Chief, Evaluation Staff  
Flight Standards Service

Planning

~~The functions and responsibilities of the Flight Standards Division, its Air Carrier Branch and Air Carrier District Offices are not being accomplished in accordance with the functional assignments and responsibilities set forth in the Western Region Organization Handbook.~~

Discussion

The Western Region Organization Handbook, WE P 1100.1, sets forth the regional organization, functional assignments, and delegations of authority. The handbook also authorizes division chiefs to redelegate authority within their organization except where specifically limited. Paragraph 202 of WE P 1100.1 assigns division chiefs the responsibility to evaluate and provide advice on the adequacy of delegations and organizational provisions for functions performed in the field for which they have a technical or line responsibility. Another paragraph states that each head of an organizational element shall insure that his element is organized effectively. It further states that in order to assure coherence in organizational pattern, he should generally retain control over organizational structures and allocation of functions two levels below his own. It states, "For example, a division chief should control organization to the section level but authorize his branch chiefs to redelegate their authority as they believe appropriate." Section 2 of the handbook contains the statement, "It is the policy of the Flight Standards Division to make delegations to the branch chiefs directly from the Office of the Division Chief; to do so whenever possible on the principle of exceptions, by which specific limitations are established on the division chief's broad general authority to carry out the division's program; . . ."

The functions of planning, directing, controlling, and evaluating the execution of assigned programs and the organization and operations established in the region to accomplish them are assigned to the Flight Standards Division Chief in Section 2 of WE P 1100.1. The assistant division chief, according to the assignment of functions contained in the handbook, shares this responsibility with the division chief. Although the division chief has the overall responsibility for all of the programs assigned to the division, the Air Carrier Branch has been assigned functional responsibility to plan, direct, control, and evaluate the execution of programs assigned to the branch and the organization and operations established in the region to accomplish them and to provide direct line supervision and program direction to Air Carrier District Offices (ACDO's). Paragraph 2665 of WE P 1100.1 states that the functions of Air Carrier District Offices are to effectively accomplish Air Carrier Branch programs, or parts thereof, at the field level. In so doing, Air Carrier District Offices have functional responsibility to plan, direct, and evaluate assigned work programs and the organization and operations established in the ACDO to accomplish such programs.

Although each level of the organization in the regional Flight Standards Division, as well as the ACDO, is assigned functional responsibility for planning, directing, controlling, and evaluating the execution of assigned programs and the organization and operations established to accomplish the assigned programs, interviews indicate that all levels of management below the division chief have abdicated their responsibility to the next lower level. There are several indications that the middle levels of management are not evaluating the accomplishments of the ACDO's. For example, work programs prepared and submitted by ACDO's were approved by the Air Carrier Branch although accomplishment of the planned program was not possible with available resources; most of the ACDO's have developed an office manual as a result of FS P 1380.6, "Standard Procedure for Uniform Reporting - Air Carrier District Offices." The office manual that they have developed is not a useful management tool, but the regional office had taken no action to see that the office manual was improved; they have not established formal procedures to assure compliance or for following up to determine that action in critical areas is being or has been taken. As a result, the middle levels of management are not providing adequate direction to the ACDO's and the lower levels of management have not been held accountable for the effective accomplishment of their assigned functions until a serious condition is brought to the attention of the regional office through outside sources. There is a definite indication, based on review of files and interviews, that all management levels within the Flight Standards Division do not have accurate knowledge of their assigned functional responsibilities or the functions of district offices in regard to:

- a. Delegation of authority.
- b. Line of authority.
- c. Qualification of lower level personnel and their capability to satisfactorily handle the authority delegated.
- d. Promotion appraisals.
- e. Environmental factors.
- f. Inadequacy of office manuals.
- g. Development, adjustment, and execution of work programs.

Paragraph 304 of WE P 1100.1 states that each division chief and staff officer is responsible for keeping the regional director advised of the status, progress, support requirements, and problems significant to

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Actions taken by many key personnel, below the level of division chief, in the western Region Flight Standards organization reflect an attitude and philosophy which is not conducive to achieving a high level of safety in air carrier operations.

#### Discussion

Review of files and records, as well as interviews with personnel, in offices under the jurisdiction of the Western Region Flight Standards Division revealed that many personnel assigned to air carrier programs are not sensitive and responsive to critical safety situations even though they observe them. This condition was evidenced in relation to air carrier operations matters, not in matters relating to the certification of airmen. In many cases actions taken by air carrier personnel appear to be in defense of the operator rather than being conducive to achieving a high level of safety. There is a strong tendency for personnel to apply only those parts of the regulation which have a direct and specific written statement concerning the circumstances encountered rather than striving to achieve the highest degree of safety through intelligent application of the "intent" of the entire regulation.

Review of files and records indicates that in most cases where an air carrier is found to be using maintenance or operating practices considered questionable, inspectors have very little initiative or imagination in using the tools presently available to secure a high level of safety. As an example, a certificated air carrier that did not have a good history of taking action to correct minor discrepancies noted during routine surveillance, had several discrepancies existing when it applied for renewal of its certificate; however, the certificate was renewed before the discrepancies were corrected. In many cases when conditions or practices which were "undesirable" insofar as their contribution to a high level of safety were known to the air carrier inspector, he has verbally advised air carrier management that the condition should be corrected. The verbal communication in most cases was not followed up with a written notice containing a clear statement indicating that the condition must be corrected or the carrier will be in violation of the regulations. In other cases air carrier certificates have been extended to allow correction of discrepancies. When the extension period had elapsed the conditions still were not corrected so another extension of the certificate was granted. One air carrier was allowed to operate on "extensions" by letter of authority for five months. A philosophy that allows noncompliance with regulations is not consistent with the philosophy of promoting the safety of flight. Renewal of an air carrier certificate when the carrier is not in compliance with the regulations certainly does not cause the carrier to hold very high regard for its duty "to perform their services with the highest possible degree of safety" as set forth in section 601(b) of the Federal Aviation Act.

Recommendations

That the Western Region initiate a vigorous on-the-job training program for air carrier operations and maintenance inspectors which will emphasize the objectives of air carrier programs and methods of achieving those objectives.

That the Western Region publish a directive which clearly specifies that each level of supervision is accountable for deficiencies that exist in his assigned areas of authority and responsibilities, even though he has redelegated authority and functional responsibility to a lower level of supervision.

That the Executive Staff of Flight Standards Service, the Operations Division, and the Maintenance Division jointly take such action as may be required to provide a formal training course in Air Carrier Certificate Administration.

Finding

The flow of information between the various organizational levels does not provide for the effective and uniform control of programs.

Discussion

The demonstrated lack of knowledge by various regional office personnel concerning the actual execution of field programs substantiates the need for more effective flow of information from the district office to regional office. This is further substantiated by the fact that known conditions have developed into highly critical situations that could have been prevented by closer regional field liaison and better guidance from the regional office. At present much of the technical guidance furnished to Air Carrier District Offices (ACDO's) is contained in memorandums or is given verbally during visits or telephone conversations. There are very few regional directives which provide technical or program guidance to ACDO's. As a result ACDO's must research incoming memorandums from the regional office, regional and Washington directives as well as records of telephone conversations in order to be reasonable sure that they are applying the latest policy. Even then, because some of the policy has been given verbally and may have been forgotten, they cannot be sure that they have complied with the desires of the regional office on the matter in question. This results in non-uniform application of regional policies and procedures and does not provide for effective control of the programs. Interviews indicate that district office personnel are reluctant to request guidance from the regional office. This may be caused by a fear that such action will be related to inability, on their part, to make technical decisions or to understand the regional policy.

A system for forwarding highlight information concerning problem areas or potentially critical areas from the ACDO to the regional office would improve the overall control and effectiveness of the air carrier programs. Such a report might also include the status of incidents being investigated that may lead to enforcement action.

Recommendation

That the Western Region initiate action to assure that statements of regional policy are contained in appropriate regional directives and to establish a formal system which will provide for a flow of pertinent information from the ACDO to the appropriate organizational element of the regional office.



Finding

An effective evaluation system for the air carrier program areas has not been established in the Western Region.

Discussion

Most supervisory levels in the air carrier programs do not indicate an awareness of their responsibility to control and evaluate their assigned programs. The complacency of principal and supervising inspectors indicates that they are not held accountable for self evaluation of programs for which they have responsibility nor do they attempt to design their work program to best fit the need of the Agency as affected by the environmental situations. Long standing deficiencies known to the assigned inspector but not known to appropriate people in the regional office indicate a deficiency in the evaluation process.

Recommendations

That the Western Region publish a regional directive which will emphasize the responsibility of supervisory personnel to use the accepted management practice of self evaluation. If the published directive does not result in correction of existing deficiencies, reassignment of key supervisory personnel should be considered.

That the Western Region take such action as may be required to establish a meaningful and objective evaluation of all air carrier programs and establish a means of providing such followup action as may be required to see that reported deficiencies are corrected.