

DCA21FA174

OPERATIONAL FACTORS/HUMAN PERFORMANCE

Attachment 20

Rhoades Aviation, Inc. Audit Report

May 4, 2022

Original Audit Report Submitted by the Auditor to Rhoades Aviation, Inc.

RAI

ORIGINAL

Audit Report

Form	Rev.	Date
SIEM-004/1	Orig.	05/08/2013

The Audit Report shall be completed by the auditor who conducted the audit. Addition pages may be used to complete the report or provide substantiating data and objective evidence. Attach at additional pages to the back of this report form.

1. IEP Auditor(s): Miguel Ramirez Jr	2. Date(s) of Audit: 4/30/2021 - 5/6/2021
3. Department of Entity being Audited: Mx Ops	4. Who requested Audit: D.S.
5. Type of Audit ☒ Scheduled ☐ Special ☐ Follow-up ☐ External	
6. Location(s): Hanger 1 & 2	7. Reason for Audit: IEP
8. Identification of DCTs and SAls used in Audit: 4.3 Maintenance Operations	
9. List of Other Guidelines Used: Advisory Circular (AC) AC-43-9, AC-43.9-1, AC-43.13-2, AC-43-210, AC-120-16, AC-120-42, AC-120-77, FAA Order 8900.1 Vol 2 Ch 4 Sec 6, Vol 3 Ch 42 Sec 1, Vol 3 Ch 43 Sec 1, Vol 3 Ch 43 Sec 2, Vol 3 Ch 32 Sec 4, Vol 3 Ch 31 Sec 5, Vol 3 Ch 31 Sec 6, Vol 3 Ch 32 Sec 10, Vol 3 Ch 32 Sec 11, Vol 4 Ch 4 Sec 1, Vol 4 Ch 4 Sec 10, Vol 4 Ch 4 Sec 11, Vol 4 Ch 4 Sec 3, Vol 4 Ch 4 Sec 7, Vol 4 Ch 4 Sec 8, Vol 4 Ch 6 Sec 2, Vol 4 Ch 6 Sec 3, Vol 4 Ch 9 Sec 1, Vol 6 Ch 11 Sec 14, Vol 6 Ch 11 Sec 19, Vol 6 Ch 2 Sec 28, Vol 6 Ch 2 Sec 35, Vol 6 Ch 2 Sec 36, Vol 6 Ch 2 Sec 4, Vol 4 Ch 4 Sec 4, OpSpecs D086, D095, FAR's 1.1, 5.21, 5.23(a)(b), 5.25(a)(b)(c), 5.51, 5.53, 5.55, 5.71, 5.73, 5.75, 5.91, 5.93, 43.3, 43.5, 43.7, 43.9, 43.9(a)(b)(d), 43 Appendix A, 43 Appendix B, 43.11, 43.13(a)(c), 43.16, 43.17(e), 91.417(c), 91.419, PL-81, 91.403(b), 119.65(d), 121.105, 121.123, 121.135(b), 121.365(b)(c), 121.367(a)(b), 121.369(a)(b)(c), 121.371(a), 121.371(b)(c)(d), 121.374, 121.374(a)(b)(c)(d)(e)(f)(g)(h)(i)(j)(k)(l)(m)(n)(o), 121.375, 121.379(a)(b), 121.380(a), 121.380(c), 121.628(a), 121.701(a)(b), 121.707(a)(b), 121.709(a)(b)(c)(d)(e), 135.179(a)(b), 135.23(f)(g), 135.411(a), 135.413, 135.413(b), 135.419, 135.421, 135.423(c), 135.425(a), 135.427(b)(c), 135.429(a)(b)(c)(e), 135.437(a)(b), 135.439(a)(b)(c), 135.441, 135.443, 135.443(b), 135.65(a)(b)(c)(d), 135.73, Other Guidance 8300.16	
10. Comments and Explanations of DCT/SAI "NO" Responses: Item #1- Several instances of missing references and information as to what was done to the aircraft/engine FAR 43.9. In the case of a reported or observed failure or malfunction Pilots have failed to make an entry in the log of safety critical issues to the safety of flight as required per 121.701. Item #2- Key management personnel not understanding that Part 5 is applicable and they are responsible FAR's 5.51, 5.53, 5.55. No QC/QA department to provide oversight. Maintenance sign-offs difficult to read, impossible to tell one number from another, use general ATA instead of specific ATA, page, chapter, paragraph. Item #3- Found items that required inspection that were not accomplished, several instances where work performed remains a concern and not properly addressed. FAR 121.709. Item #4- Part 5 of FAR's not understood and thought to be applicable to other individuals. Item #5- Part 5 of FAR's not understood and thought to be applicable to other individuals. Communication is poor between operations and maintenance. People too busy to keep the aircraft in airworthy condition that steps are ignored or missed a safety risk takes a back seat. Item #7- Part 5 of FAR's not understood and thought to be applicable to other individuals. Item #8- No current listing of persons who have been trained, qualified, and authorized to conduct required inspections by occupational title, and the inspections that they are authorized to perform FAR 121.371. No training program to determine the adequacy of work procedures, techniques, new equipment used to perform duties FAR 121.375. Item #9- Recent incident where the RII inspector did perform maintenance on the item he was going to RII FAR 121.371(c). Refresher training given, but no documentation of course found FAR 121.371(a). Item #11- Inspection of maintenance records show several areas of training missing from records. Some mechanics have inadequate hours compared to other for same training. Records show inconsistent training given. No course outline or syllabus found for any training. Item #12- Part 5 of FAR's not understood and thought to be applicable to other individuals. Item #13- Part 5 of FAR's not understood and thought to be applicable to other departments and individuals not maintenance or the mechanics. Item #14- Part 5 of FAR's not understood and thought to be applicable to other departments and individuals not maintenance or the mechanics. Item #16- Records indicate that the MEL was performed, but the Specific Procedures maintenance was not clear. When the MEL was cleared No mention of what was done in the specific procedures or follow up maintenance is mention. Item #18- Development of operational procedure changes FAR 5.21, 5.23(a), 5.25(a), 5.25(b)(c) not considered. No, primary concern is to return aircraft back to service. Part 5 of FAR's not understood and thought to be applicable to other individuals. Item #19- No, primary concern to 5.23(a), 5.23(b), 5.23(c). Safety risk is not primary concern, what is primary is to return aircraft back to service. Item #20- Part 5 of FAR's not understood and thought to be applicable to	

RAI

Audit Report

Form	Rev.	Date
SIEM-004/2	Orig.	05/08/2013

10. Comments and Explanations of DCT/SAI "NO" Responses: Item #20 Cont.- other departments and individuals, maintenance or the mechanics. Item #21-Part 5 of FAR's not understood and thought to be applicable to other departments and individuals not maintenance or the mechanics. Item #22- Manuals have yet to be revised and approved by the FAA FAR 121.369. There is no approved training program 121.375. Manual for the repair of cargo containers nonexistent and outdated 121.379. Item #23- There have been incidents where repairs have been signed off using wrong references and the problem continues to be an issue. FAR's 121.367, 121369, 43.17, 5.23, 5.51, 5.53, 5.55. Item #24-No clear communication between maintenance, operations, chief pilot and other departments. FAR's 119.65(d) and 121.375. Item #25- Key management personnel not understanding that Part 5 is applicable and they are responsible FAR's 5.51, 5.53, 5.55. No QC/QA department to provide oversight. Maintenance sign-offs difficult to read, impossible to tell one number from another, use general ATA instead of specific ATA, page, chapter, paragraph. Item #26- Part 5 of FAR's not understood and thought to be applicable to other departments and individuals not maintenance or the mechanics. Item #27- Management is aware of systemic and significant issues, but no solution has been implemented and safety performance and assurance not considered their primary job, only to get aircraft back in service. FAR's 5.71, 5.73 and 5.75. Item #28- Too many repeat maintenance items on same aircrafts to indicate that safety accountability, competencies, training and communication are not considered their primary function, only to get aircraft back in service. FAR's 5.23, 5.91 and 5.93.		
11. Description of Observations Made:		
12. Findings and Concerns	☒ LEVEL I	☐ LEVEL II ☐ LEVEL III
13. Evaluation of Effectiveness of Corrective Actions Implemented Because of Findings or Concerns Discovered in Previous Audit (If Applicable):		
14. Description of Any Voluntary Disclosure Activities:		
15. Instructions for the Operational Manager or Contractor to Respond if Required:		
16. Summary of Audit and System Safety Status to Include Hazards Identified:		
17. Recommendations or Actions Taken:		

Miguel Ramirez Jr

5/6/2021

Signature of Auditor

Date

Signature of Director of Safety

Date

List of Attachments – Please Check Those that are Attached:

- ☐ Additional Pages Needed To Complete Report
- ☐ Copy of Audit Plan
- ☐ Pre-Audit Meeting Minutes
- ☒ Annotated SAIs and DCTs
- ☐ Applicable Safety Reports and Action Plans
- ☐ Other Documentation That Substantiates Findings
- ☐ Post-Audit Meeting Minutes

DCT To Go Report

CH/A: JRAA - RHOADES AVIATION INC
MLF Label: 4.3 Maintenance Operations (Released)
DCT Type: SP DCT
Specialty: Airworthiness
DCT Revision: 17.0 on 03/29/19 (Released)

Summary Information

Purpose (Certificate Holder Responsibility): The CH is responsible to manage the safety of the Maintenance Operations processes within its operation.

Objective (FAA Responsibility): The FAA objective is to determine if the CH; (1) Met regulatory requirements, guidance, and safety performance objectives of its Maintenance Operations processes, and; (2) Managed safety of the Maintenance Operations processes by incorporating system safety principles which include safety attributes.

The Maintenance Operations Subsystem includes the following Element(s)

4.3 Maintenance Operations

- 4.3.1 (AW) Airworthiness Release/Maintenance Log Requirements
- 4.3.2 (AW) Required Inspection Items (RII)
- 4.3.3 (AW) MEL/CDL/NEF and Other Deferred Maintenance
- 4.3.4 (AW) Major Repairs & Alterations

Common Data Fields

Start Date
End Date
Departure Point
Arrival Point
Location: (Nearest) Airfield
Related/Affiliated Designator
Off Hour
8430-13 Number
Make/Model/Series
Aircraft Registration Number
Flight Number
Simulator Device ID
Local/Regional/National
CH/A Provided
Affiliated d/b/a
Airman Certificate Number
Airman Name (Last, First)
SIC Certificate Number
SIC Name (Last, First)

If work is offsite of the airfield, include one of the following

- ☐ Address 1
Address 2
Address 3
City
State
Postal Code
Country
- ☐ Latitude
Longitude

Supplemental Information

8900.1 Vol 2 Ch 4 Sec 6, 8900.1 Vol 3 Ch 31 Sec 5, 8900.1 Vol 3 Ch 31 Sec 6, 8900.1 Vol 3 Ch 32 Sec 10, 8900.1 Vol 3 Ch 32 Sec 11, 8900.1 Vol 3 Ch 32 Sec 4, 8900.1 Vol 3 Ch 42 Sec 1, 8900.1 Vol 3 Ch 43 Sec 1, 8900.1 Vol 3 Ch 43 Sec 2, 8900.1 Vol 4 Ch 4 Sec 1, 8900.1 Vol 4 Ch 4 Sec 10, 8900.1 Vol 4 Ch 4 Sec 11, 8900.1 Vol 4 Ch 4 Sec 3, 8900.1 Vol 4 Ch 4 Sec 7, 8900.1 Vol 4 Ch 4 Sec 8, 8900.1 Vol 4 Ch 6 Sec 2, 8900.1 Vol 4 Ch 6 Sec 3, 8900.1 Vol 4 Ch 9 Sec 1, 8900.1 Vol 6 Ch 11 Sec 14, 8900.1 Vol 6 Ch 11 Sec 19, 8900.1 Vol 6 Ch 2 Sec 28, 8900.1 Vol 6 Ch 2 Sec 35, 8900.1 Vol 6 Ch 2 Sec 36, 8900.1 Vol 6 Ch 2 Sec 4, 8900.1 Vol 4 Ch 4 Sec 4

Advisory Circular (AC)

AC-120-16, AC-120-42, AC-120-77, AC-43-210, AC-43-9, AC-43.13-2, AC-43.9-1

OpSpecs

D086, D095

SRR

1.1, 119.65(d), 121.105, 121.123, 121.135(b), 121.365(b), 121.365(c), 121.367(a), 121.367(b), 121.369(a), 121.369(b), 121.369(c), 121.371(a), 121.371(b), 121.371(c), 121.371(d), 121.374, 121.374(a), 121.374(b), 121.374(c), 121.374(d), 121.374(e), 121.374(f), 121.374(g), 121.374(h), 121.374(i), 121.374(j), 121.374(k), 121.374(l), 121.374(m), 121.374(n), 121.374(o), 121.375, 121.379(a), 121.379(b), 121.380(a), 121.380(c), 121.628(a), 121.701(a), 121.701(b), 121.707(a), 121.707(b), 121.709(a), 121.709(b), 121.709(c), 121.709(d), 121.709(e), 135.179(a), 135.179(b), 135.23(f), 135.23(g), 135.411(a), 135.413, 135.413(b), 135.419, 135.421, 135.423(c), 135.425(a), 135.427(b), 135.427(c), 135.429(a), 135.429(b), 135.429(c), 135.429(e), 135.437(a), 135.437(b), 135.439(a), 135.439(b), 135.439(c), 135.441, 135.443, 135.443(b), 135.65(a), 135.65(b), 135.65(c), 135.65(d), 135.73, 43 Appendix A, 43 Appendix B, 43.11, 43.13(a), 43.13(c), 43.16, 43.17(e), 43.3, 43.5, 43.7, 43.9, 43.9(a), 43.9(b), 43.9(d), 5.23(a), 5.23(b), 5.25(a), 5.25(b), 5.25(c), 5.51, 5.75, 5.91, 5.93, 91.417(c), 91.419, PL-81, 91.403(b), 5.21, 5.53, 5.55, 5.71, 5.73

Other Guidance

8300.16

Questions	Answers	References
4.3.1 (AW) Airworthiness Release/Maintenance Log Requirements		
1 Did the certificate holder meet its regulatory and guidance requirements for Airworthiness Release/Maintenance Log Requirements? Several instances of missing references and information as to what was done to the aircraft/engine FAR 43.9. In the case of a reported or observed failure or malfunction NOTE: Pilots have failed to make an entry in the log of safety critical issues to the safety of flight as required per 121.701. Safety Attribute: Procedures, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 7 3/29/2019 8:16:09 AM, QID: 00015830, Response Details: Procedures SP DCTs (Both OP and AW), Status: Released	☐ Met regulatory and guidance requirements ☒ Isolated instance(s) when guidance requirements were not met ☐ Several instances when guidance requirements were not met ☐ Regulatory noncompliance ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: 8900.1 Vol 2 Ch 4 Sec 6, 8900.1 Vol 3 Ch 31 Sec 5, 8900.1 Vol 3 Ch 31 Sec 6, 8900.1 Vol 3 Ch 32 Sec 10, 8900.1 Vol 3 Ch 32 Sec 11, 8900.1 Vol 4 Ch 4 Sec 1, 8900.1 Vol 4 Ch 4 Sec 8, 8900.1 Vol 6 Ch 2 Sec 36, AC-120-16, AC-43-9, D095, 121.369(c), 121.701(a), 121.701(b), 121.709(a), 121.709(b), 121.709(c), 121.709(d), 121.709(e), 135.179(a), 135.23(f), 135.23(g), 135.413, 135.443, 135.443(b), 135.65(a), 135.65(b), 135.65(c), 135.65(d), 43.9(a)
2 Did the certificate holder's controls effectively mitigate unacceptable levels of risk(s) for the Airworthiness Release/Maintenance Log Requirements process? Key management personnel not understanding that Part 5 is applicable and they are responsible FAR's 5.51, 5.53, 5.55. No QC/QA department to provide oversight. Maintenance sign-offs difficult to read, impossible to tell one number from another, use general ATA instead of specific ATA, page, chapter, paragraph NOTE: Safety Attribute: Controls, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 5 3/29/2019 8:16:09 AM, QID: 00015831, Response Details: Controls ED/EP/SP DCTs (Both OP and AW), Status: Released	☐ Controls were effective ☒ Isolated instance(s) when controls were not effective ☐ Several instances when controls were not effective ☐ Systemic, significant issues, or regulatory non-compliance ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: 8900.1 Vol 3 Ch 31 Sec 5, 8900.1 Vol 3 Ch 32 Sec 11, 8900.1 Vol 6 Ch 2 Sec 36, AC-120-16, 121.369(c), 121.701(a), 121.709(a), 121.709(b), 121.709(c), 121.709(d), 121.709(e), 5.51, 5.53, 5.55
3 Did the certificate holder's Airworthiness Release/Maintenance Log process ensure consistency of related processes between departments and employees (interfaces)? NOTE: Found items that required inspection that were not accomplished, several instances where work performed remains a concern and not properly addressed. FAR 121.709. Safety Attribute: Interfaces, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 5 3/29/2019 8:16:09 AM, QID: 00015832, Response Details: Interfaces ED/EP/SP DCTs (Both OP and AW), Status: Released	☐ Interfaces were effective ☒ Isolated instance(s) when interfaces were ineffective ☐ Several instances when interfaces were ineffective ☐ Systemic or significant issues ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: 121.701(b), 121.709(d)
4 Were financial and human resources provided to ensure the safety and quality performance for the Airworthiness Release/Maintenance Log Requirements process? NOTE: Part 5 of FAR's not understood and thought to be applicable to other individuals. Safety Attribute: Management Responsibility, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 5 3/29/2019 8:16:09 AM, QID: 00015833, Response Details: Responsibility ED/EP/SP DCTs (Both OP and AW), Status: Released	☐ Management of the process was effective ☒ Isolated instance(s) where management of the process was ineffective ☐ Several instances where management of the process was ineffective ☐ Systemic, significant issues, or regulatory non-compliance ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: 5.23(a), 5.25(a), 5.25(b), 5.25(c), 5.21

Questions	Answers	References
5 Did the person with authority over the certificate holder's Airworthiness Release/Maintenance Log Requirements process effectively plan, direct, control, or change procedures, and make key determinations, including safety risk acceptance decisions? Part 5 of FAR's not understood and thought to be applicable to other individuals. Communication is poor between operations and maintenance. People too busy to keep the aircraft in airworthy condition that steps are ignored or missed an safety risk takes a back seat. NOTE: keep the aircraft in airworthy condition that steps are ignored or missed an safety risk takes a back seat. Safety Attribute: Management Authority, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 5 3/29/2019 8:16:09 AM, QID: 00015834, Response Details: Authority ED/EP/SP DCTs (Both OP and AW), Status: Released	☐ Management of the process was effective ☐ Isolated instance(s) where management of the process was ineffective ☒ Several instances where management of the process was ineffective ☐ Systemic, significant issues, or regulatory non-compliance ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: 5.23(a), 5.23(b), 5.25(c)
6 Were the certificate holder's process measurement(s) used to evaluate the performance of the Airworthiness Release/Maintenance Log Requirements process and if necessary, implement corrective action? NOTE: Safety Attribute: Process Measurement, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 6 3/29/2019 8:16:10 AM, QID: 00015835, Response Details: Process Measurement ED/EP/SP DCTs (Both OP and AW), Status: Released	☒ Process measurements were effective ☐ Isolated instance(s) when process measurements were not used or ineffective ☐ Several instances when process measurements were not used or ineffective ☐ Systemic, significant issues, or regulatory non-compliance ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: 5.75, 5.71, 5.73
7 Did the certificate holder's personnel understand their role and contribute to the safety performance of the Airworthiness Release/Maintenance Log Requirements process? NOTE: Part 5 of FAR's not understood and thought to be applicable to other individuals. Safety Attribute: Safety Ownership, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 5 3/29/2019 8:16:10 AM, QID: 00015836, Response Details: Safety Ownership ED/EP/SP DCTs (Both OP and AW), Status: Released	☐ Individuals were knowledgeable ☐ Isolated instance(s) where knowledge was lacking ☐ Several instances where knowledge was lacking ☒ Systemic, significant issues, or regulatory non-compliance ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: 5.23(a), 5.91, 5.93
4.3.2 (AW) Required Inspection Items (RII)		
8 Did the certificate holder meet its regulatory and guidance requirements for RII? No current listing of persons who have been trained, qualified, and authorized to conduct required inspections by occupational title, and the inspections that they are authorized to perform FAR 121.371. No training program to determine the adequacy of work procedures, techniques, new equipment used to perform duties FAR 121.375. NOTE: to perform FAR 121.371. No training program to determine the adequacy of work procedures, techniques, new equipment used to perform duties FAR 121.375. Safety Attribute: Procedures, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 7 3/29/2019 8:16:06 AM, QID: 00015837, Response Details: Procedures SP DCTs (Both OP and AW), Status: Released	☐ Met regulatory and guidance requirements ☒ Isolated instance(s) when guidance requirements were not met ☐ Several instances when guidance requirements were not met ☐ Regulatory noncompliance ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: 8900.1 Vol 3 Ch 42 Sec 1, 8900.1 Vol 3 Ch 43 Sec 1, 8900.1 Vol 3 Ch 43 Sec 2, AC-120-16, 121.105, 121.123, 121.365(b), 121.365(c), 121.367(b), 121.369(a), 121.369(b), 121.371(a), 121.371(b), 121.371(c), 121.371(d), 121.375, 135.423(c), 135.427(b), 135.427(c), 135.429(a), 135.429(b), 135.429(c), 135.429(d), 43.9(b)
9 Did the certificate holder's controls effectively mitigate unacceptable levels of risk(s) for the RII process? Recent incident where the RII inspector did perform maintenance on the item he was going to RII FAR 121.371(c). Refresher training given, but no documentation of course found FAR 121.371(a). NOTE: going to RII FAR 121.371(c). Refresher training given, but no documentation of course found FAR 121.371(a). Safety Attribute: Controls, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 4 3/29/2019 8:15:28 AM, QID: 00015838, Response Details: Controls ED/EP/SP DCTs (Both OP and AW), Status: Released	☐ Controls were effective ☒ Isolated instance(s) when controls were not effective ☐ Several instances when controls were not effective ☐ Systemic, significant issues, or regulatory non-compliance ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: 8900.1 Vol 3 Ch 43 Sec 1, AC-120-16, 121.369(b), 121.371(a), 121.371(b), 121.371(c), 121.371(d), 5.51, 5.53, 5.55
10 Did the certificate holder's RII process ensure consistency of related processes between departments and employees (interfaces)? NOTE: Safety Attribute: Interfaces, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 4 3/29/2019 8:15:25 AM, QID: 00015839, Response Details: Interfaces ED/EP/SP DCTs (Both OP and AW), Status: Released	☒ Interfaces were effective ☐ Isolated instance(s) when interfaces were ineffective ☐ Several instances when interfaces were ineffective ☐ Systemic or significant issues ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: 121.365(b), 121.365(c), 121.369(a), 121.371(d)
11 Were financial and human resources provided to ensure the safety and quality performance for the RII process?	☐ Management of the process was effective	☐ Corrected On-the-Spot: ☐ PI Alert:

Questions	Answers	References
Inspection of maintenance records show several areas of training missing from records. NOTE: Some mechanics have inadequate hours compared to other for same training. Records show inconsistent training given. No course outline or syllabus found for any training. Safety Attribute: Management Responsibility, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 4 3/29/2019 8:15:28 AM, QID: 00015840, Response Details: Responsibility ED/EP/SP DCTs (Both OP and AW), Status: Released	☒ Isolated instance(s) where management of the process was ineffective ☐ Several instances where management of the process was ineffective ☐ Systemic, significant issues, or regulatory non-compliance ☐ Not Observable	REFERENCES: 5.23(a), 5.25(a), 5.25(b), 5.25(c), 5.21
12 Did the person with authority over the certificate holder's RII process effectively plan, direct, control, or change procedures, and make key determinations, including safety risk acceptance decisions? NOTE: Part 5 of FAR's not understood and thought to be applicable to other individuals. Safety Attribute: Management Authority, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 4 3/29/2019 8:15:25 AM, QID: 00015841, Response Details: Authority ED/EP/SP DCTs (Both OP and AW), Status: Released	☐ Management of the process was effective ☒ Isolated instance(s) where management of the process was ineffective ☐ Several instances where management of the process was ineffective ☐ Systemic, significant issues, or regulatory non-compliance ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: 5.23(a), 5.23(b), 5.25(c)
13 Were the certificate holder's process measurement(s) used to evaluate the performance of the RII process and if necessary, implement corrective action? NOTE: Part 5 of FAR's not understood and thought to be applicable to other departments and individuals not maintenance or the mechanics. Safety Attribute: Process Measurement, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 5 3/29/2019 8:15:32 AM, QID: 00015842, Response Details: Process Measurement ED/EP/SP DCTs (Both OP and AW), Status: Released	☐ Process measurements were effective ☒ Isolated instance(s) when process measurements were not used or ineffective ☐ Several instances when process measurements were not used or ineffective ☐ Systemic, significant issues, or regulatory non-compliance ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: 5.75, 5.71, 5.73
14 Did the certificate holder's personnel understand their role and contribute to the safety performance of the RII process? NOTE: Part 5 of FAR's not understood and thought to be applicable to other departments and individuals not maintenance or the mechanics. Safety Attribute: Safety Ownership, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 4 3/29/2019 8:15:25 AM, QID: 00015843, Response Details: Safety Ownership ED/EP/SP DCTs (Both OP and AW), Status: Released	☐ Individuals were knowledgeable ☒ Isolated instance(s) where knowledge was lacking ☐ Several instances where knowledge was lacking ☐ Systemic, significant issues, or regulatory non-compliance ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: 5.23(a), 5.91, 5.93
4.3.3 (AW) MEL/CDL/NEF and Other Deferred Maintenance		
15 Did the certificate holder meet its regulatory and guidance requirements for MEL / CDL / Deferred MX? NOTE: Safety Attribute: Procedures, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 9 3/29/2019 8:15:32 AM, QID: 00015844, Response Details: Procedures SP DCTs (Both OP and AW), Status: Released	☒ Met regulatory and guidance requirements ☐ Isolated instance(s) when guidance requirements were not met ☐ Several instances when guidance requirements were not met ☐ Regulatory noncompliance ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: 8900.1 Vol 4 Ch 4 Sec 1, 8900.1 Vol 4 Ch 4 Sec 10, 8900.1 Vol 4 Ch 4 Sec 11, 8900.1 Vol 4 Ch 4 Sec 3, 8900.1 Vol 4 Ch 4 Sec 7, 8900.1 Vol 4 Ch 4 Sec 8, 8900.1 Vol 6 Ch 2 Sec 4, AC-120-77, D095, 121.628(a), 121.701(a), 135.179(a), 135.179(b), 135.65(c), 43.13(a), 43.13(c), 43.16, PL-81, 8900.1 Vol 4 Ch 4 Sec 4
16 Did the certificate holder's controls effectively mitigate unacceptable levels of risk(s) for the MEL / CDL / Deferred MX process? NOTE: Records indicate that the MEL was performed, but the Specific Procedures maintenance was not clear. When the MEL was cleared No mention of what was done in the specific procedures or follow up maintenance is mention. Safety Attribute: Controls, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 4 3/29/2019 8:15:25 AM, QID: 00015845, Response Details: Controls ED/EP/SP DCTs (Both OP and AW), Status: Released	☐ Controls were effective ☒ Isolated instance(s) when controls were not effective ☐ Several instances when controls were not effective ☐ Systemic, significant issues, or regulatory non-compliance ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: 8900.1 Vol 4 Ch 4 Sec 11, 8900.1 Vol 6 Ch 2 Sec 4, AC-120-77, D095, 121.628(a), 121.701(a), 43.13(a), 43.13(c), 43.16, 5.51, 5.53, 5.55
17 Did the certificate holder's MEL / CDL / Deferred MX process ensure consistency of related processes between departments and employees (interfaces)? NOTE: Safety Attribute: Interfaces, Question Type: Process Observation,	☒ Interfaces were effective ☐ Isolated instance(s) when interfaces were ineffective ☐ Several instances when interfaces were ineffective ☐ Systemic or significant issues	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: D095

Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 4 3/29/2019 8:15:26 AM,

QID: 00015846, Response Details: Interfaces ED/EP/SP DCTs (Both OP and AW), Status: Released

- 18 Were financial and human resources provided to ensure the safety and quality performance for the MEL / CDL / Deferred MX process?

NOTE: Development of operational procedure changes (FAR 5.21, 5.23(a), 5.25(a), 5.25(b)(c)) not considered. No, primary concern is to return aircraft back to service. Part 5 of FAR's not understood and thought to be applicable to other individuals.

Safety Attribute: Management Responsibility, Question Type: Process Observation,

Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 4 3/29/2019 8:15:26 AM,

QID: 00015847, Response Details: Responsibility ED/EP/SP DCTs (Both OP and AW), Status: Released

- 19 Did the person with authority over the certificate holder's MEL / CDL / Deferred MX process effectively plan, direct, control, or change procedures, and make key determinations, including safety risk acceptance decisions?

NOTE: No, primary concern to 5.23(a), 5.23(b), 5.23(c). Safety risk is not primary concern, what is primary is to return aircraft back to service.

Safety Attribute: Management Authority, Question Type: Process Observation,

Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 4 3/29/2019 8:15:26 AM,

QID: 00015848, Response Details: Authority ED/EP/SP DCTs (Both OP and AW), Status: Released

- 20 Were the certificate holder's process measurement(s) used to evaluate the performance of the MEL / CDL / Deferred MX process and if necessary, implement corrective action?

NOTE: Part 5 of FAR's not understood and thought to be applicable to other departments and individuals not maintenance or the mechanics.

Safety Attribute: Process Measurement, Question Type: Process Observation,

Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 5 3/29/2019 8:15:32 AM,

QID: 00015849, Response Details: Process Measurement ED/EP/SP DCTs (Both OP and AW), Status: Released

- 21 Did the certificate holder's personnel understand their role and contribute to the safety performance of the MEL / CDL / Deferred MX process?

NOTE: Part 5 of FAR's not understood and thought to be applicable to other departments and individuals not maintenance or the mechanics.

Safety Attribute: Safety Ownership, Question Type: Process Observation,

Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 4 3/29/2019 8:15:26 AM,

QID: 00015850, Response Details: Safety Ownership ED/EP/SP DCTs (Both OP and AW), Status: Released

4.3.4 (AW) Major Repairs & Alterations

- 22 Did the certificate holder meet its regulatory and guidance requirements for Major Repairs and Alterations?

NOTE: Manuals have yet to be revised and approved by the FAA FAR 121.369. There is no approved training program 121.375. Manual for the repair of cargo containers nonexistent and outdated 121.379.

Safety Attribute: Procedures, Question Type: Process Observation,

Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 6 3/29/2019 8:15:31 AM,

QID: 00015851, Response Details: Procedures SP DCTs (Both OP and AW), Status: Released

☐ Not Observable

☐ Management of the process was effective

☒ Isolated instance(s) where management of the process was ineffective

☐ Several instances where management of the process was ineffective

☐ Systemic, significant issues, or regulatory non-compliance

☐ Not Observable

☐ Corrected On-the-Spot:

☐ PI Alert:

REFERENCES: 5.23(a), 5.25(a), 5.25(b), 5.25(c), 5.21

☐ Management of the process was effective

☒ Isolated instance(s) where management of the process was ineffective

☐ Several instances where management of the process was ineffective

☐ Systemic, significant issues, or regulatory non-compliance

☐ Not Observable

☐ Corrected On-the-Spot:

☐ PI Alert:

REFERENCES: 5.23(a), 5.23(b), 5.25(c)

☐ Process measurements were effective

☒ Isolated instance(s) when process measurements were not used or ineffective

☐ Several instances when process measurements were not used or ineffective

☐ Systemic, significant issues, or regulatory non-compliance

☐ Not Observable

☐ Corrected On-the-Spot:

☐ PI Alert:

REFERENCES: 5.75, 5.71, 5.73

☐ Individuals were knowledgeable

☒ Isolated instances where knowledge was lacking

☐ Several instances where knowledge was lacking

☐ Systemic, significant issues, or regulatory non-compliance

☐ Not Observable

☐ Corrected On-the-Spot:

☐ PI Alert:

REFERENCES: 5.23(a), 5.91, 5.93

☐ Met regulatory and guidance requirements

☐ Isolated instance(s) when guidance requirements were not met

☐ Several instances when guidance requirements were not met

☒ Regulatory noncompliance

☐ Not Observable

☐ Corrected On-the-Spot:

☐ PI Alert:

REFERENCES: 8900.1 Vol 3 Ch 31 Sec 5, 8900.1 Vol 3 Ch 31 Sec 6, 8900.1 Vol 3 Ch 43 Sec 1, 8900.1 Vol 4 Ch 9 Sec 1, 8900.1 Vol 6 Ch 11 Sec 14, 8900.1 Vol 6 Ch 11 Sec 19, 8900.1 Vol 6 Ch 2 Sec 28, 8900.1 Vol 6 Ch 2 Sec 35, AC-120-16, AC-120-77, AC-43-210, AC-43.13-2, AC-43.9-1, 1.1, 119.65(d), 121.135(b), 121.367(a), 121.369(b), 121.369(c), 121.375, 121.379(a), 121.379(b), 121.380(a), 121.380(c), 121.707(a), 121.707(b), 135.411(a), 135.413(b), 135.419, 135.421, 135.425(a), 135.427(b), 135.437(a), 135.437(b), 135.439(a), 135.439(b), 135.439(c), 135.441, 135.73, 43 Appendix A, 43 Appendix B, 43.11, 43.13(a), 43.16, 43.17(e), 43.3, 43.5, 43.7, 43.9, 43.9(d), 91.417(c), 91.419, 91.403(b), 8300.16

Questions	Answers	References
23 Did the certificate holder's controls effectively mitigate unacceptable levels of risk(s) for the Major Repairs and Alterations process? NOTE: There have been incidents where repairs have been signed off using wrong references and the problem continues to be an issue. FAR's 121.367, 121.369, 43.17, 5.23, 5.51, 5.53, 5.55. Safety Attribute: Controls, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 4 3/29/2019 8:15:26 AM, QID: 00015852, Response Details: Controls ED/EP/SP DCTs (Both OP and AW), Status: Released	☐ Controls were effective ☐ Isolated instance(s) when controls were not effective ☐ Several instances when controls were not effective ☒ Systemic, significant issues, or regulatory non-compliance ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: AC-120-77, AC-43-210, 121.367(a), 121.369(c), 121.379(a), 121.379(b), 121.380(c), 43.17(e), 5.51, 5.53, 5.55
24 Did the certificate holder's Major Repairs and Alterations process ensure consistency of related processes between departments and employees (interfaces)? NOTE: No clear communication between maintenance, operations, chief pilot and other departments. FAR's 119.65(d) and 121.375. Safety Attribute: Interfaces, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 4 3/29/2019 8:15:28 AM, QID: 00015853, Response Details: Interfaces ED/EP/SP DCTs (Both OP and AW), Status: Released	☐ Interfaces were effective ☐ Isolated instance(s) when interfaces were ineffective ☐ Several instances when interfaces were ineffective ☒ Systemic or significant issues ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: 8900.1 Vol 3 Ch 31 Sec 5, 8900.1 Vol 3 Ch 43 Sec 1, 8900.1 Vol 6 Ch 11 Sec 19, AC-120-16, AC-120-77, 1.1, 119.65(d), 121.135(b), 121.369(b), 121.375, 121.380(a), 121.707(a), 121.707(b), 43 Appendix A
25 Were financial and human resources provided to ensure the safety and quality performance for the Major Repairs and Alterations process? NOTE: Key management personnel not understanding that Part 5 is applicable and they are responsible FAR's 5.51, 5.53, 5.55. No QC/QA department to provide oversight. Maintenance sign-offs difficult to read, impossible to tell one number from another, use general ATA instead of specific ATA, page, chapter, paragraph. Safety Attribute: Management Responsibility, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 4 3/29/2019 8:15:28 AM, QID: 00015854, Response Details: Responsibility ED/EP/SP DCTs (Both OP and AW), Status: Released	☐ Management of the process was effective ☐ Isolated instance(s) where management of the process was ineffective ☐ Several instances where management of the process was ineffective ☒ Systemic, significant issues, or regulatory non-compliance ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: 5.23(a), 5.25(a), 5.25(b), 5.25(c), 5.21
26 Did the person with authority over the certificate holder's Major Repairs and Alterations process effectively plan, direct, control, or change procedures, and make key determinations, including safety risk acceptance decisions? NOTE: Part 5 of FAR's not understood and thought to be applicable to other departments and individuals not maintenance or the mechanics. Safety Attribute: Management Authority, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 4 3/29/2019 8:15:27 AM, QID: 00015855, Response Details: Authority ED/EP/SP DCTs (Both OP and AW), Status: Released	☐ Management of the process was effective ☐ Isolated instance(s) where management of the process was ineffective ☐ Several instances where management of the process was ineffective ☒ Systemic, significant issues, or regulatory non-compliance ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: 5.23(a), 5.23(b), 5.25(c)
27 Were the certificate holder's process measurement(s) used to evaluate the performance of the Major Repairs and Alterations process and if necessary, implement corrective action? NOTE: Management is aware of systemic and significant issues, but no solution has been implemented and safety performance and assurance not considered their primary job, only to get aircraft back in service. FAR's 5.71, 5.73 and 5.75. Safety Attribute: Process Measurement, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 5 3/29/2019 8:15:32 AM, QID: 00015856, Response Details: Process Measurement ED/EP/SP DCTs (Both OP and AW), Status: Released	☐ Process measurements were effective ☐ Isolated instance(s) when process measurements were not used or ineffective ☐ Several instances when process measurements were not used or ineffective ☒ Systemic, significant issues, or regulatory non-compliance ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: 5.75, 5.71, 5.73
28 Did the certificate holder's personnel understand their role and contribute to the safety performance of the Major Repairs and Alterations process? NOTE: Too many repeat maintenance items on same aircrafts to indicate that safety accountability, competencies, training and communication are not considered their primary function, only to get aircraft back in service. FAR's 5.23, 5.91 and 5.93. Safety Attribute: Safety Ownership, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 4 3/29/2019 8:15:27 AM, QID: 00015857, Response Details: Safety Ownership ED/EP/SP DCTs (Both OP and AW), Status: Released	☐ Individuals were knowledgeable 14% ☐ Isolated instances where knowledge was lacking 54% ☐ Several instances where knowledge was lacking 4% ☒ Systemic, significant issues, or regulatory non-compliance 28% ☐ Not Observable 0%	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: 5.23(a), 5.91, 5.93

Response Details List N/O Response Detail (Released, 2.0)

- Personnel (e.g., key certificate holder personnel not present/available)
- Equipment (e.g., equipment not present/available/in serviceable condition)
- Event did not occur (e.g., did not observe an intoxicated passenger on the flight)

68% OK
32% No

- 4 Time Constraints (e.g., resources/workload)
- 5 Weather (e.g., weather needed for observation not present or weather made observation impossible)
- 6 Other

Response Details List Procedures SP DCTs (Both OP and AW) (Released, 1.0)

- 1 Unclear procedure(s)
- 2 Conflicting procedure(s)
- 3 Used workaround(s)
- 4 Skipped process step(s)
- 5 Personnel failed to follow process (procedures, guidance, etc)
- 6 Procedures/guidance not available
- 7 Procedures/guidance not current
- 8 Inconsistent procedure(s)
- 9 Undocumented procedure(s)
- 10 Minor typographical error(s) (i.e. record entries)
- 11 Information missing
- 12 Communication failure(s)
- 13 Personnel failed to perform task
- 14 Process failed to meet desired outcome
- 15 Process oversight failure
- 16 Equipment/tools not available
- 17 Equipment/tools not adequate
- 18 Equipment/tools not calibrated
- 19 Facilities not adequate
- 20 Other

Response Details List Controls ED/EP/SP DCTs (Both OP and AW) (Released, 1.0)

- 1 Failure to identify hazards or ineffective risk controls
- 2 Failure to develop and maintain risk controls
- 3 Failure to effectively mitigate risk before applying risk controls
- 4 Risk controls ineffective
- 5 Unclear risk controls
- 6 Failure to assess risk for a new system
- 7 Failure to assess risk when revising an existing system
- 8 Failure to assess risk when developing operational procedures
- 9 Failure to maintain records of outputs of risk control assessments
- 10 Other

Response Details List Interfaces ED/EP/SP DCTs (Both OP and AW) (Released, 1.0)

- 1 Internal communication failure(s)
- 2 External communication failure(s)
- 3 Lack of interfaces
- 4 Inconsistent interfaces
- 5 Poor coordination between departments and employees
- 6 Failure of interfaces between processes or procedures
- 7 Other

Response Details List Responsibility ED/EP/SP DCTs (Both OP and AW) (Released, 1.0)

- 1 Failed to provide financial resources
- 2 Failed to provide sufficient human resources
- 3 Individual not clearly identified
- 4 Failure to ensure safety of process
- 5 Failure to oversee operations conducted under the certificate
- 6 Failed to ensure quality performance of process
- 7 Process oversight failure
- 8 Communication failure(s)
- 9 Other

Response Details List Authority ED/EP/SP DCTs (Both OP and AW) (Released, 1.0)

- 1 Process oversight failure
- 2 Unacceptable safety risk acceptance

- 3 Ineffective planning of resources
- 4 Ineffective use of resources
- 5 Ineffective control of resources
- 6 Failure to implement safety risk processes
- 7 Process owner not clearly identified
- 8 Unqualified
- 9 Other

Response Details List Process Measurement ED/EP/SP DCTs (Both OP and AW) (Released, 1.0)

- 1 Inadequate monitoring of operations processes
- 2 Ineffective evaluations of processes or systems
- 3 Undocumented or insufficient investigations
- 4 Failure to conduct audits
- 5 Ineffective audits
- 6 Failure to detect changes in the operational environment
- 7 Personnel failed to perform/follow process (procedures, guidance, etc.)
- 8 Process failed to meet desired outcome
- 9 Process oversight failure
- 10 Other

Response Details List Safety Ownership ED/EP/SP DCTs (Both OP and AW) (Released, 3.0)

- 1 Unaware of or ineffective safety policies or processes
- 2 Unaware of or ineffective safety related reporting tools
- 3 Unclear safety policy
- 4 Ineffective safety related training
- 5 Lack of safety culture
- 6 Unclear safety objectives
- 7 Other

Modified Audit Report Submitted by the Auditor to Rhoades Aviation, Inc.

This report was mentioned during the auditor's interview with the NTSB, reference Operational Factors/Human Performance – Attachment 3: Previous Rhoades Aviation, Inc. Personnel Interview transcripts, beginning on pg. 141

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Audit Report

Form	Rev.	Date
SIEM-004/1	Orig.	05/08/2013

The Audit Report shall be completed by the auditor who conducted the audit. Addition pages may be used to complete the report or provide substantiating data and objective evidence. Attach at additional pages to the back of this report form.

1. IEP Auditor(s): Miguel Ramirez Jr	2. Date(s) of Audit: 4/30/2021 - 5/6/2021
3. Department of Entity being Audited: Mx Ops	4. Who requested Audit: D.S.
5. Type of Audit ☒ Scheduled ☐ Special ☐ Follow-up ☐ External	
6. Location(s): Hanger 1 & 2	7. Reason for Audit: IEP
8. Identification of DCTs and SAls used in Audit: 4.3 Maintenance Operations	
9. List of Other Guidelines Used: Advisory Circular (AC) AC-43-9, AC-43.9-1, AC-43.13-2, AC-43-210, AC-120-16, AC-120-42, AC-120-77, FAA Order 8900.1 Vol 2 Ch 4 Sec 6, Vol 3 Ch 42 Sec 1, Vol 3 Ch 43 Sec 1, Vol 3 Ch 43 Sec 2, Vol 3 Ch 32 Sec 4, Vol 3 Ch 31 Sec 5, Vol 3 Ch 31 Sec 6, Vol 3 Ch 32 Sec 10, Vol 3 Ch 32 Sec 11, Vol 4 Ch 4 Sec 1, Vol 4 Ch 4 Sec 10, Vol 4 Ch 4 Sec 11, Vol 4 Ch 4 Sec 3, Vol 4 Ch 4 Sec 7, Vol 4 Ch 4 Sec 8, Vol 4 Ch 6 Sec 2, Vol 4 Ch 6 Sec 3, Vol 4 Ch 9 Sec 1, Vol 6 Ch 11 Sec 14, Vol 6 Ch 11 Sec 19, Vol 6 Ch 2 Sec 28, Vol 6 Ch 2 Sec 35, Vol 6 Ch 2 Sec 36, Vol 6 Ch 2 Sec 4, Vol 4 Ch 4 Sec 4, OpSpecs D086, D095, FAR's 1.1, 5.21, 5.23(a)(b), 5.25(a)(b)(c), 5.51, 5.53, 5.55, 5.71, 5.73, 5.75, 5.91, 5.93, 43.3, 43.5, 43.7, 43.9, 43.9(a)(b)(d), 43 Appendix A, 43 Appendix B, 43.11, 43.13(a)(c), 43.16, 43.17(e), 91.417(c), 91.419, PL-81, 91.403(b), 119.65(d), 121.105, 121.123, 121.135(b), 121.365(b)(c), 121.367(a)(b), 121.369(a)(b)(c), 121.371(a), 121.371(b)(c)(d), 121.374, 121.374(a)(b)(c)(d)(e)(f)(g)(h)(i)(j)(k)(l)(m)(n)(o), 121.375, 121.379(a)(b), 121.380(a), 121.380(c), 121.628(a), 121.701(a)(b), 121.707(a)(b), 121.709(a)(b)(c)(d)(e), 135.179(a)(b), 135.23(f)(g), 135.411(a), 135.413, 135.413(b), 135.419, 135.421, 135.423(c), 135.425(a), 135.427(b)(c), 135.429(a)(b)(c)(e), 135.437(a)(b), 135.439(a)(b)(c), 135.441, 135.443, 135.443(b), 135.65(a)(b)(c)(d), 135.73, Other Guidance 8300.16	
10. Comments and Explanations of DCT/SAI "NO" Responses: Item #1- Several instances of missing references and information as to what was done to the aircraft/engine FAR 43.9. In the case of a reported or observed failure or malfunction Pilots have failed to make an entry in the log of safety critical issues to the safety of flight as required per 121.701. Item #2- No QC/QA department to provide oversight. Maintenance sign-offs difficult to read, impossible to tell one number from another, use general ATA instead of specific ATA, page, chapter, paragraph. Item #3- Found items that were MEL'd but required specific procedures that were not addressed in the sign-off. Some MEL's did not have due dates. Instances where work performed remains a concern and not properly addressed. FAR 121.709. Item #4 - A few instances were maintenance needed additional help concerning issue. Development of operational procedure changes FAR 5.21, 5.23(a), 5.25(a), 5.25(b), 5.25(c) not considered. Item #5 - A few instances were maintenance needed additional help concerning issue. Development of operational procedure changes FAR 5.51, 5.53(c), 5.55(c) not considered. Item #7- A few instances were maintenance needed additional help concerning issue. Development of operational procedure changes FAR 5.23(c), 5.91, 5.93 not considered. Item #8- No current listing of persons who have been trained, qualified, and authorized to conduct required inspections by occupational title, and the inspections that they are authorized to perform FAR 121.371. No training program to determine the adequacy of work procedures, techniques, new equipment used to perform duties FAR 121.375. Item #9- Recent incident where the RII inspector did perform maintenance on the item he was going to RII FAR 121.371(c). Refresher training given, but no documentation of course found FAR 121.371(a). Item #11- Inspection of maintenance records show several areas of training missing from records. Some mechanics have inadequate hours compared to other for same training. Records show inconsistent training given. No course outline or syllabus found for any training. Item #12- A few instances were maintenance needed additional help concerning issue. Development of risk management procedure changes FAR 5.23(a), 5.23(b), 5.25(c) not considered. Item #13- A few instances were maintenance needed additional help concerning issue. Development of safety assurance procedure changes FAR 5.71, 5.73, 5.75 not considered. Item #14- A few instances were maintenance needed additional help concerning issue. Development of safety assurance procedure changes FAR 5.23(a), 5.91, 5.93 not considered. Item #16- Records indicate that the MEL was performed, but the Specific Procedures maintenance was not clear. When the MEL was cleared No mention of what was done in the specific procedures or follow up maintenance is mention. Item #18 - No QC/QA department to provide oversight. Maintenance sign-offs difficult to read, impossible to tell one number from another, use general ATA instead of specific ATA, page, chapter, paragraph. Item #19- No, primary concern to 5.23(a), 5.23(b), 5.23(c). Safety risk is not primary concern, what is primary is to return aircraft back to service. Item #20 - Maintenance busy performing several functions keeping the aircraft in airworthy condition that safety assurance policy FAR 5.71, 5.73 and 5.73 are overlooked.	

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Audit Report

Form	Rev.	Date
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Item #21 - Maintenance busy performing several functions keeping the aircraft in airworthy condition that safety policy FAR 5.23(a) and promotion FAR 5.91, 5.93 are overlooked. Item #22- Manuals have yet to be revised and approved by the FAA FAR 121.369. There is no approved training program 121.375. Manual for the repair of cargo containers nonexistent and outdated 121.379. Item #23- There have been incidents where repairs have been signed off using wrong references and the problem continues to be an issue. FAR's 121.367, 121.369, 43.17, 5.23, 5.51, 5.53, 5.55. Item #25 - No QC/QA department to provide oversight. Maintenance sign-offs difficult to read, impossible to tell one number from another, use general ATA instead of specific ATA, page, chapter, paragraph

11. Description of Observations Made:

12. Findings and Concerns ☐ LEVEL I ☒ LEVEL II ☐ LEVEL III

13. Evaluation of Effectiveness of Corrective Actions Implemented Because of Findings or Concerns Discovered in Previous Audit (If Applicable):

14. Description of Any Voluntary Disclosure Activities:

15. Instructions for the Operational Manager or Contractor to Respond if Required:

16. Summary of Audit and System Safety Status to Include Hazards Identified:

17. Recommendations or Actions Taken:

Miguel Ramirez Jr

5/6/2021

Signature of Auditor

Date

Signature of Director of Safety

Date

List of Attachments – Please Check Those that are Attached:

- ☐ Additional Pages Needed To Complete Report
- ☐ Copy of Audit Plan
- ☐ Pre-Audit Meeting Minutes
- ☒ Annotated SAIs and DCTs
- ☐ Applicable Safety Reports and Action Plans
- ☐ Other Documentation That Substantiates Findings
- ☐ Post-Audit Meeting Minutes

DCT To Go Report

CH/A: JRAA - RHOADES AVIATION INC
MLF Label: 4.3 Maintenance Operations (Released)
DCT Type: SP DCT
Specialty: Airworthiness
DCT Revision: 17.0 on 03/29/19 (Released)

Summary Information

Purpose (Certificate Holder Responsibility): The CH is responsible to manage the safety of the Maintenance Operations processes within its operation.

Objective (FAA Responsibility): The FAA objective is to determine if the CH; (1) Met regulatory requirements, guidance, and safety performance objectives of its Maintenance Operations processes, and; (2) Managed safety of the Maintenance Operations processes by incorporating system safety principles which include safety attributes.

The Maintenance Operations Subsystem includes the following Element(s)

- 4.3 Maintenance Operations
- 4.3.1 (AW) Airworthiness Release/Maintenance Log Requirements
 - 4.3.2 (AW) Required Inspection Items (RII)
 - 4.3.3 (AW) MEL/CDL/NEF and Other Deferred Maintenance
 - 4.3.4 (AW) Major Repairs & Alterations

Common Data Fields

Start Date
End Date
Departure Point
Arrival Point
Location: (Nearest) Airfield
Related/Affiliated Designator
Off Hour
8430-13 Number
Make/Model/Series
Aircraft Registration Number
Flight Number
Simulator Device ID
Local/Regional/National
CH/A Provided
Affiliated d/b/a
Airman Certificate Number
Airman Name (Last, First)
SIC Certificate Number
SIC Name (Last, First)
If work is offsite of the airfield, include one of the following

- ☐ Address 1
- Address 2
- Address 3
- City
- State
- Postal Code
- Country
- ☐ Latitude
- Longitude

Supplemental Information

8900.1 Vol 2 Ch 4 Sec 6, 8900.1 Vol 3 Ch 31 Sec 5, 8900.1 Vol 3 Ch 31 Sec 6, 8900.1 Vol 3 Ch 32 Sec 10, 8900.1 Vol 3 Ch 32 Sec 11, 8900.1 Vol 3 Ch 32 Sec 4, 8900.1 Vol 3 Ch 42 Sec 1, 8900.1 Vol 3 Ch 43 Sec 1, 8900.1 Vol 3 Ch 43 Sec 2, 8900.1 Vol 4 Ch 4 Sec 1, 8900.1 Vol 4 Ch 4 Sec 10, 8900.1 Vol 4 Ch 4 Sec 11, 8900.1 Vol 4 Ch 4 Sec 3, 8900.1 Vol 4 Ch 4 Sec 7, 8900.1 Vol 4 Ch 4 Sec 8, 8900.1 Vol 4 Ch 6 Sec 2, 8900.1 Vol 4 Ch 6 Sec 3, 8900.1 Vol 4 Ch 9 Sec 1, 8900.1 Vol 6 Ch 11 Sec 14, 8900.1 Vol 6 Ch 11 Sec 19, 8900.1 Vol 6 Ch 2 Sec 28, 8900.1 Vol 6 Ch 2 Sec 35, 8900.1 Vol 6 Ch 2 Sec 36, 8900.1 Vol 6 Ch 2 Sec 4, 8900.1 Vol 4 Ch 4 Sec 4

Advisory Circular (AC)

AC-120-16, AC-120-42, AC-120-77, AC-43-210, AC-43-9, AC-43.13-2, AC-43.9-1

OpSpecs

D086, D095

SRR

1.1, 119.65(d), 121.105, 121.123, 121.135(b), 121.365(b), 121.365(c), 121.367(a), 121.367(b), 121.369(a), 121.369(b), 121.369(c), 121.371(a), 121.371(b), 121.371(c), 121.371(d), 121.374, 121.374(a), 121.374(b), 121.374(c), 121.374(d), 121.374(e), 121.374(f), 121.374(g), 121.374(h), 121.374(i), 121.374(j), 121.374(k), 121.374(l), 121.374(m), 121.374(n), 121.374(o), 121.375, 121.379(a), 121.379(b), 121.380(a), 121.380(c), 121.628(a), 121.701(a), 121.701(b), 121.707(a), 121.707(b), 121.709(a), 121.709(b), 121.709(c), 121.709(d), 121.709(e), 135.179(a), 135.179(b), 135.23(f), 135.23(g), 135.411(a), 135.413, 135.413(b), 135.419, 135.421, 135.423(c), 135.425(a), 135.427(b), 135.427(c), 135.429(a), 135.429(b), 135.429(c), 135.429(e), 135.437(a), 135.437(b), 135.439(a), 135.439(b), 135.439(c), 135.441, 135.443, 135.443(b), 135.65(a), 135.65(b), 135.65(c), 135.65(d), 135.73, 43 Appendix A, 43 Appendix B, 43.11, 43.13(a), 43.13(c), 43.16, 43.17(e), 43.3, 43.5, 43.7, 43.9, 43.9(a), 43.9(b), 43.9(d), 5.23(a), 5.23(b), 5.25(a), 5.25(b), 5.25(c), 5.51, 5.75, 5.91, 5.93, 91.417(c), 91.419, PL-81, 91.403(b), 5.21, 5.53, 5.55, 5.71, 5.73

Other Guidance

8300.16

Questions	Answers	References
4.3.1 (AW) Airworthiness Release/Maintenance Log Requirements		
1 Did the certificate holder meet its regulatory and guidance requirements for Airworthiness Release/Maintenance Log Requirements? Several instances of missing references and information as to what was done to the aircraft/engine FAR 43.9. In the case of a reported or observed failure or malfunction NOTE: Pilots have failed to make an entry in the log of safety critical issues to the safety of flight as required per 121.701. Safety Attribute: Procedures, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 7 3/29/2019 8:16:09 AM, QID: 00015830, Response Details: Procedures SP DCTs (Both OP and AW), Status: Released	☐ Met regulatory and guidance requirements ☒ Isolated instance(s) when guidance requirements were not met ☐ Several instances when guidance requirements were not met ☐ Regulatory noncompliance ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: 8900.1 Vol 2 Ch 4 Sec 6, 8900.1 Vol 3 Ch 31 Sec 5, 8900.1 Vol 3 Ch 31 Sec 6, 8900.1 Vol 3 Ch 32 Sec 10, 8900.1 Vol 3 Ch 32 Sec 11, 8900.1 Vol 3 Ch 32 Sec 4, 8900.1 Vol 4 Ch 4 Sec 8, 8900.1 Vol 6 Ch 2 Sec 36, AC-120-16, AC-43-9, D095, 121.369(c), 121.701(a), 121.701(b), 121.709(a), 121.709(b), 121.709(c), 121.709(d), 121.709(e), 135.179(a), 135.23(f), 135.23(g), 135.413, 135.443, 135.443(b), 135.65(a), 135.65(b), 135.65(c), 135.65(d), 43.9(a)
2 Did the certificate holder's controls effectively mitigate unacceptable levels of risk(s) for the Airworthiness Release/Maintenance Log Requirements process? No QC/QA department to provide oversight. Maintenance sign-offs difficult to read, impossible to tell one number from another, use general ATA instead of specific ATA, page, chapter, paragraph NOTE: Safety Attribute: Controls, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 5 3/29/2019 8:16:09 AM, QID: 00015831, Response Details: Controls ED/EP/SP DCTs (Both OP and AW), Status: Released	☐ Controls were effective ☒ Isolated instance(s) when controls were not effective ☐ Several instances when controls were not effective ☐ Systemic, significant issues, or regulatory non-compliance ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: 8900.1 Vol 3 Ch 31 Sec 5, 8900.1 Vol 3 Ch 32 Sec 11, 8900.1 Vol 6 Ch 2 Sec 36, AC-120-16, 121.369(c), 121.701(a), 121.709(a), 121.709(b), 121.709(c), 121.709(d), 121.709(e), 5.51, 5.53, 5.55
3 Did the certificate holder's Airworthiness Release/Maintenance Log process ensure consistency of related processes between departments and employees (interfaces)? Found items that were MEL'd but required specific procedures that were not addressed in the sign-off. Some MEL's did not have due dates. Instances where work performed NOTE: remains a concerned and not properly addressed. FAR 121.709. Safety Attribute: Interfaces, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 5 3/29/2019 8:16:09 AM, QID: 00015832, Response Details: Interfaces ED/EP/SP DCTs (Both OP and AW), Status: Released	☐ Interfaces were effective ☒ Isolated instance(s) when interfaces were ineffective ☐ Several instances when interfaces were ineffective ☐ Systemic or significant issues ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: 121.701(b), 121.709(d)
4 Were financial and human resources provided to ensure the safety and quality performance for the Airworthiness Release/Maintenance Log Requirements process? A few instances were maintenance needed additional help concerning issue. NOTE: Development of operational procedure changes FAR 5.51, 5.53(c), 5.55(c) not considered. Safety Attribute: Management Responsibility, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 5 3/29/2019 8:16:09 AM, QID: 00015833, Response Details: Responsibility ED/EP/SP DCTs (Both OP and AW), Status: Released	☐ Management of the process was effective ☒ Isolated instance(s) where management of the process was ineffective ☐ Several instances where management of the process was ineffective ☐ Systemic, significant issues, or regulatory non-compliance ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: 5.23(a), 5.25(a), 5.25(b), 5.25(c), 5.21

Questions	Answers	References
5 Did the person with authority over the certificate holder's Airworthiness Release/Maintenance Log Requirements process effectively plan, direct, control, or change procedures, and make key determinations, including safety risk acceptance decisions? A few instances were maintenance needed additional help concerning issue. Development of operational procedure changes (FAR 5.51, 5.53(c), 5.55(c) not considered. NOTE: Safety Attribute: Management Authority, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 5 3/29/2019 8:16:09 AM, QID: 00015834, Response Details: Authority ED/EP/SP DCTs (Both OP and AW), Status: Released	☐ Management of the process was effective ☒ Isolated instance(s) where management of the process was ineffective ☐ Several instances where management of the process was ineffective ☐ Systemic, significant issues, or regulatory non-compliance ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PPI Alert: REFERENCES: 5.23(a), 5.23(b), 5.25(c)
6 Were the certificate holder's process measurement(s) used to evaluate the performance of the Airworthiness Release/Maintenance Log Requirements process and if necessary, implement corrective action? NOTE: Safety Attribute: Process Measurement, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 6 3/29/2019 8:16:10 AM, QID: 00015835, Response Details: Process Measurement ED/EP/SP DCTs (Both OP and AW), Status: Released	☒ Process measurements were effective ☐ Isolated instance(s) when process measurements were not used or ineffective ☐ Several instances when process measurements were not used or ineffective ☐ Systemic, significant issues, or regulatory non-compliance ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PPI Alert: REFERENCES: 5.75, 5.71, 5.73
7 Did the certificate holder's personnel understand their role and contribute to the safety performance of the Airworthiness Release/Maintenance Log Requirements process? A few instances were maintenance needed additional help concerning issue. Development of operational procedure changes FAR 5.51, 5.53(c), 5.55(c) not considered. NOTE: Safety Attribute: Safety Ownership, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 5 3/29/2019 8:16:10 AM, QID: 00015836, Response Details: Safety Ownership ED/EP/SP DCTs (Both OP and AW), Status: Released	☐ Individuals were knowledgeable ☒ Isolated instances where knowledge was lacking ☐ Several instances where knowledge was lacking ☐ Systemic, significant issues, or regulatory non-compliance ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PPI Alert: REFERENCES: 5.23(a), 5.91, 5.93
4.3.2 (AW) Required Inspection Items (RII)		
8 Did the certificate holder meet its regulatory and guidance requirements for RII? No current listing of persons who have been trained, qualified, and authorized to conduct required inspections by occupational title, and the inspections that they are authorized to perform FAR 121.371. No training program to determine the adequacy of work procedures, techniques, new equipment used to perform duties FAR 121.375. NOTE: Safety Attribute: Procedures, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 7 3/29/2019 8:16:06 AM, QID: 00015837, Response Details: Procedures SP DCTs (Both OP and AW), Status: Released	☐ Met regulatory and guidance requirements ☒ Isolated instance(s) when guidance requirements were not met ☐ Several instances when guidance requirements were not met ☐ Regulatory noncompliance ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PPI Alert: REFERENCES: 8900.1 Vol 3 Ch 42 Sec 1, 8900.1 Vol 3 Ch 43 Sec 1, 8900.1 Vol 3 Ch 43 Sec 2, AC-120-16, 121.105, 121.123, 121.365(b), 121.365(c), 121.367(b), 121.369(a), 121.369(b), 121.371(a), 121.371(b), 121.371(c), 121.371(d), 121.375, 135.423(c), 135.427(b), 135.427(c), 135.429(a), 135.429(b), 135.429(c), 135.429(e), 43.9(b)
9 Did the certificate holder's controls effectively mitigate unacceptable levels of risk(s) for the RII process? Recent incident where the RII inspector did perform maintenance on the item he was going to RII FAR 121.371(c). Refresher training given, but no documentation of course found FAR 121.371(a). NOTE: Safety Attribute: Controls, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 4 3/29/2019 8:15:28 AM, QID: 00015838, Response Details: Controls ED/EP/SP DCTs (Both OP and AW), Status: Released	☐ Controls were effective ☒ Isolated instance(s) when controls were not effective ☐ Several instances when controls were not effective ☐ Systemic, significant issues, or regulatory non-compliance ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PPI Alert: REFERENCES: 8900.1 Vol 3 Ch 43 Sec 1, AC-120-16, 121.369(b), 121.371(a), 121.371(b), 121.371(c), 121.371(d), 5.51, 5.53, 5.55
10 Did the certificate holder's RII process ensure consistency of related processes between departments and employees (interfaces)? NOTE: Safety Attribute: Interfaces, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 4 3/29/2019 8:15:25 AM, QID: 00015839, Response Details: Interfaces ED/EP/SP DCTs (Both OP and AW), Status: Released	☒ Interfaces were effective ☐ Isolated instance(s) when interfaces were ineffective ☐ Several instances when interfaces were ineffective ☐ Systemic or significant issues ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PPI Alert: REFERENCES: 121.365(b), 121.365(c), 121.369(a), 121.371(d)
11 Were financial and human resources provided to ensure the safety and quality performance for the RII process?	☐ Management of the process was effective	☐ Corrected On-the-Spot: ☐ PPI Alert:

Questions	Answers	References
Inspection of maintenance records show several areas of training missing from records NOTE: Some mechanics have inadequate hours compared to other for same training. Records show inconsistent training given. No course outline or syllabus found for any training Safety Attribute: Management Responsibility, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 4 3/29/2019 8:15:28 AM, QID: 00015840, Response Details: Responsibility ED/EP/SP DCTs (Both OP and AW), Status: Released	☒ Isolated instance(s) where management of the process was ineffective ☐ Several instances where management of the process was ineffective ☐ Systemic, significant issues, or regulatory non-compliance ☐ Not Observable	REFERENCES: 5.23(a), 5.25(a), 5.25(b), 5.25(c), 5.21
12 Did the person with authority over the certificate holder's RII process effectively plan, direct, control, or change procedures, and make key determinations, including safety risk acceptance decisions? A few instances were maintenance needed additional help concerning issue. NOTE: Development of risk management procedure changes FAR 5.23(a), 5.23(b), 5.25(c) not considered. Safety Attribute: Management Authority, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 4 3/29/2019 8:15:25 AM, QID: 00015841, Response Details: Authority ED/EP/SP DCTs (Both OP and AW), Status: Released	☐ Management of the process was effective ☒ Isolated instance(s) where management of the process was ineffective ☐ Several instances where management of the process was ineffective ☐ Systemic, significant issues, or regulatory non-compliance ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: 5.23(a), 5.23(b), 5.25(c)
13 Were the certificate holder's process measurement(s) used to evaluate the performance of the RII process and if necessary, implement corrective action? A few instances were maintenance needed additional help concerning issue. NOTE: Development of safety assurance procedure changes FAR 5.71, 5.73, 5.75 not considered. Safety Attribute: Process Measurement, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 5 3/29/2019 8:15:32 AM, QID: 00015842, Response Details: Process Measurement ED/EP/SP DCTs (Both OP and AW), Status: Released	☐ Process measurements were effective ☒ Isolated instance(s) when process measurements were not used or ineffective ☐ Several instances when process measurements were not used or ineffective ☐ Systemic, significant issues, or regulatory non-compliance ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: 5.75, 5.71, 5.73
14 Did the certificate holder's personnel understand their role and contribute to the safety performance of the RII process? A few instances were maintenance needed additional help concerning issue. NOTE: Development of safety assurance procedure changes FAR 5.23(a), 5.91, 5.93 not considered. Safety Attribute: Safety Ownership, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 4 3/29/2019 8:15:25 AM, QID: 00015843, Response Details: Safety Ownership ED/EP/SP DCTs (Both OP and AW), Status: Released	☐ Individuals were knowledgeable ☒ Isolated instances where knowledge was lacking ☐ Several instances where knowledge was lacking ☐ Systemic, significant issues, or regulatory non-compliance ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: 5.23(a), 5.91, 5.93
4.3.3 (AW) MEL/CDL/NEF and Other Deferred Maintenance		
15 Did the certificate holder meet its regulatory and guidance requirements for MEL / CDL / Deferred MX? NOTE: Safety Attribute: Procedures, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 9 3/29/2019 8:15:32 AM, QID: 00015844, Response Details: Procedures SP DCTs (Both OP and AW), Status: Released	☒ Met regulatory and guidance requirements ☐ Isolated instance(s) when guidance requirements were not met ☐ Several instances when guidance requirements were not met ☐ Regulatory noncompliance ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: 8900.1 Vol 4 Ch 4 Sec 1, 8900.1 Vol 4 Ch 4 Sec 10, 8900.1 Vol 4 Ch 4 Sec 11, 8900.1 Vol 4 Ch 4 Sec 3, 8900.1 Vol 4 Ch 4 Sec 7, 8900.1 Vol 4 Ch 4 Sec 8, 8900.1 Vol 6 Ch 2 Sec 4, AC-120-77, D095, 121.628(a), 121.701(a), 135.179(a), 135.179(b), 135.65(c), 43.13(a), 43.13(c), 43.16, PL-81, 8900.1 Vol 4 Ch 4 Sec 4
16 Did the certificate holder's controls effectively mitigate unacceptable levels of risk(s) for the MEL / CDL / Deferred MX process? Records indicate that the MEL was performed, but the Specific Procedures maintenance was not clear. When the MEL was cleared No mention of what was done in the specific procedures or follow up maintenance is mention NOTE: Safety Attribute: Controls, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 4 3/29/2019 8:15:25 AM, QID: 00015845, Response Details: Controls ED/EP/SP DCTs (Both OP and AW), Status: Released	☐ Controls were effective ☒ Isolated instance(s) when controls were not effective ☐ Several instances when controls were not effective ☐ Systemic, significant issues, or regulatory non-compliance ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: 8900.1 Vol 4 Ch 4 Sec 11, 8900.1 Vol 6 Ch 2 Sec 4, AC-120-77, D095, 121.628(a), 121.701(a), 43.13(a), 43.13(c), 43.16, 5.51, 5.53, 5.55
17 Did the certificate holder's MEL / CDL / Deferred MX process ensure consistency of related processes between departments and employees (interfaces)? NOTE: Safety Attribute: Interfaces, Question Type: Process Observation,	☒ Interfaces were effective ☐ Isolated instance(s) when interfaces were ineffective ☐ Several instances when interfaces were ineffective ☐ Systemic or significant issues	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: D095

Questions	Answers	References
Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 4 3/29/2019 8:15:26 AM, QID: 00015846, Response Details: Interfaces ED/EP/SP DCTs (Both OP and AW), Status: Released 18 Were financial and human resources provided to ensure the safety and quality performance for the MEL / CDL / Deferred MX process? NOTE: No QC/QA department to provide oversight. Maintenance sign-offs difficult to read, impossible to tell one number from another, use general ATA instead of specific ATA, page, chapter, paragraph. Safety Attribute: Management Responsibility, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 4 3/29/2019 8:15:26 AM, QID: 00015847, Response Details: Responsibility ED/EP/SP DCTs (Both OP and AW), Status: Released	☐ Not Observable ☐ Management of the process was effective ☒ Isolated instance(s) where management of the process was ineffective ☐ Several instances where management of the process was ineffective ☐ Systemic, significant issues, or regulatory non-compliance ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: 5.23(a), 5.25(a), 5.25(b), 5.25(c), 5.21
19 Did the person with authority over the certificate holder's MEL / CDL / Deferred MX process effectively plan, direct, control, or change procedures, and make key determinations, including safety risk acceptance decisions? NOTE: No, primary concern to 5.23(a), 5.23(b), 5.23(c) Safety risk is not primary concern, what is primary is to return aircraft back to service Safety Attribute: Management Authority, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 4 3/29/2019 8:15:26 AM, QID: 00015848, Response Details: Authority ED/EP/SP DCTs (Both OP and AW), Status: Released	☐ Management of the process was effective ☒ Isolated instance(s) where management of the process was ineffective ☐ Several instances where management of the process was ineffective ☐ Systemic, significant issues, or regulatory non-compliance ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: 5.23(a), 5.23(b), 5.25(c)
20 Were the certificate holder's process measurement(s) used to evaluate the performance of the MEL / CDL / Deferred MX process and if necessary, implement corrective action? NOTE: People too busy to perform function of keeping the aircraft in airworthy condition that safety assurance policy FAR 5.71, 5.73 and 5.73 are overlooked. Safety Attribute: Process Measurement, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 5 3/29/2019 8:15:32 AM, QID: 00015849, Response Details: Process Measurement ED/EP/SP DCTs (Both OP and AW), Status: Released	☐ Process measurements were effective ☒ Isolated instance(s) when process measurements were not used or ineffective ☐ Several instances when process measurements were not used or ineffective ☐ Systemic, significant issues, or regulatory non-compliance ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: 5.75, 5.71, 5.73
21 Did the certificate holder's personnel understand their role and contribute to the safety performance of the MEL / CDL / Deferred MX process? NOTE: People too busy to perform function of keeping the aircraft in airworthy condition that safety policy FAR 5.23(a) and promotion FAR 5.91, 5.93 are overlooked. Safety Attribute: Safety Ownership, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 4 3/29/2019 8:15:26 AM, QID: 00015850, Response Details: Safety Ownership ED/EP/SP DCTs (Both OP and AW), Status: Released	☐ Individuals were knowledgeable ☒ Isolated instances where knowledge was lacking ☐ Several instances where knowledge was lacking ☐ Systemic, significant issues, or regulatory non-compliance ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: 5.23(a), 5.91, 5.93
4.3.4 (AW) Major Repairs & Alterations 22 Did the certificate holder meet its regulatory and guidance requirements for Major Repairs and Alterations? Manuals have yet to be revised and approved by the FAA FAR 121.369. There is no approved training program 121.375. Manual for the repair of cargo containers nonexistent and outdated 121.379 NOTE: and outdated 121.379 Safety Attribute: Procedures, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 6 3/29/2019 8:15:31 AM, QID: 00015851, Response Details: Procedures SP DCTs (Both OP and AW), Status: Released	☐ Met regulatory and guidance requirements ☐ Isolated instance(s) when guidance requirements were not met ☒ Several instances when guidance requirements were not met ☐ Regulatory noncompliance ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: 8900.1 Vol 3 Ch 31 Sec 5, 8900.1 Vol 3 Ch 31 Sec 6, 8900.1 Vol 3 Ch 43 Sec 1, 8900.1 Vol 4 Ch 9 Sec 1, 8900.1 Vol 6 Ch 11 Sec 14, 8900.1 Vol 6 Ch 11 Sec 19, 8900.1 Vol 6 Ch 2 Sec 28, 8900.1 Vol 6 Ch 2 Sec 35, AC-120-16, AC-120-77, AC-43-210, AC-43.13-2, AC-43.9-1, 1.1, 119.65(d), 121.135(b), 121.367(a), 121.369(b), 121.369(c), 121.375, 121.379(a), 121.379(b), 121.380(a), 121.380(c), 121.707(a), 121.707(b), 135.411(a), 135.413(b), 135.419, 135.421, 135.425(a), 135.427(b), 135.437(a), 135.437(b), 135.439(a), 135.439(b), 135.439(c), 135.441, 135.73, 43 Appendix A, 43 Appendix B, 43.11, 43.13(a), 43.16, 43.17(e), 43.3, 43.5, 43.7, 43.9, 43.9(d), 91.417(c), 91.419, 91.403(b), 8300.16

Questions	Answers	References
23 Did the certificate holder's controls effectively mitigate unacceptable levels of risk(s) for the Major Repairs and Alterations process? NOTE: There have been incidents where repairs have been signed off using wrong references and the problem continues to be an issue. FAR's 121.367, 121.369, 43.17, 5.23, 5.51, 5.53, 5.55. Safety Attribute: Controls, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 4 3/29/2019 8:15:26 AM, QID: 00015852, Response Details: Controls ED/EP/SP DCTs (Both OP and AW), Status: Released	☐ Controls were effective ☒ Isolated instance(s) when controls were not effective ☐ Several instances when controls were not effective ☐ Systemic, significant issues, or regulatory non-compliance ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: AC-120-77, AC-43-210, 121.367(a), 121.369(c), 121.379(a), 121.379(b), 121.380(c), 43.17(e), 5.51, 5.53, 5.55
24 Did the certificate holder's Major Repairs and Alterations process ensure consistency of related processes between departments and employees (interfaces)? NOTE: Safety Attribute: Interfaces, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 4 3/29/2019 8:15:28 AM, QID: 00015853, Response Details: Interfaces ED/EP/SP DCTs (Both OP and AW), Status: Released	☒ Interfaces were effective ☐ Isolated instance(s) when interfaces were ineffective ☐ Several instances when interfaces were ineffective ☐ Systemic or significant issues ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: 8900.1 Vol 3 Ch 31 Sec 5, 8900.1 Vol 3 Ch 43 Sec 1, 8900.1 Vol 6 Ch 11 Sec 19, AC-120-16, AC-120-77, 1.1, 119.65(d), 121.135(b), 121.369(b), 121.375, 121.380(a), 121.707(a), 121.707(b), 43 Appendix A
25 Were financial and human resources provided to ensure the safety and quality performance for the Major Repairs and Alterations process? NOTE: No QC/QA department to provide oversight. Maintenance sign-offs difficult to read, impossible to tell one number from another, use general ATA instead of specific ATA, page, chapter, paragraph. Safety Attribute: Management Responsibility, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 4 3/29/2019 8:15:28 AM, QID: 00015854, Response Details: Responsibility ED/EP/SP DCTs (Both OP and AW), Status: Released	☐ Management of the process was effective ☒ Isolated instance(s) where management of the process was ineffective ☐ Several instances where management of the process was ineffective ☐ Systemic, significant issues, or regulatory non-compliance ☐ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: 5.23(a), 5.25(a), 5.25(b), 5.25(c), 5.21
26 Did the person with authority over the certificate holder's Major Repairs and Alterations process effectively plan, direct, control, or change procedures, and make key determinations, including safety risk acceptance decisions? NOTE: Safety Attribute: Management Authority, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 4 3/29/2019 8:15:27 AM, QID: 00015855, Response Details: Authority ED/EP/SP DCTs (Both OP and AW), Status: Released	☐ Management of the process was effective ☐ Isolated instance(s) where management of the process was ineffective ☐ Several instances where management of the process was ineffective ☐ Systemic, significant issues, or regulatory non-compliance ☒ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: 5.23(a), 5.23(b), 5.25(c)
27 Were the certificate holder's process measurement(s) used to evaluate the performance of the Major Repairs and Alterations process and if necessary, implement corrective action? NOTE: Safety Attribute: Process Measurement, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 5 3/29/2019 8:15:32 AM, QID: 00015856, Response Details: Process Measurement ED/EP/SP DCTs (Both OP and AW), Status: Released	☐ Process measurements were effective ☐ Isolated instance(s) when process measurements were not used or ineffective ☐ Several instances when process measurements were not used or ineffective ☐ Systemic, significant issues, or regulatory non-compliance ☒ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: 5.75, 5.71, 5.73
28 Did the certificate holder's personnel understand their role and contribute to the safety performance of the Major Repairs and Alterations process? NOTE: Safety Attribute: Safety Ownership, Question Type: Process Observation, Scoping Attribute: IF (FAR PART = "121") THEN ACTIVATE QUESTION, Rev. 4 3/29/2019 8:15:27 AM, QID: 00015857, Response Details: Safety Ownership ED/EP/SP DCTs (Both OP and AW), Status: Released	☐ Individuals were knowledgeable ☐ Isolated instances where knowledge was lacking ☐ Several instances where knowledge was lacking ☐ Systemic, significant issues, or regulatory non-compliance ☒ Not Observable	☐ Corrected On-the-Spot: ☐ PI Alert: REFERENCES: 5.23(a), 5.91, 5.93

Response Details List N/O Response Detail (Released, 2.0)

- 1 Personnel (e.g., key certificate holder personnel not present/available)
- 2 Equipment (e.g., equipment not present/available/in serviceable condition)
- 3 Event did not occur (e.g., did not observe an intoxicated passenger on the flight)

- 4 Time Constraints (e.g., resources/workload)
- 5 Weather (e.g., weather needed for observation not present or weather made observation impossible)
- 6 Other

Response Details List Procedures SP DCTs (Both OP and AW) (Released, 1.0)

- 1 Unclear procedure(s)
- 2 Conflicting procedure(s)
- 3 Used workaround(s)
- 4 Skipped process step(s)
- 5 Personnel failed to follow process (procedures, guidance, etc)
- 6 Procedures/guidance not available
- 7 Procedures/guidance not current
- 8 Inconsistent procedure(s)
- 9 Undocumented procedure(s)
- 10 Minor typographical error(s) (i.e. record entries)
- 11 Information missing
- 12 Communication failure(s)
- 13 Personnel failed to perform task
- 14 Process failed to meet desired outcome
- 15 Process oversight failure
- 16 Equipment/tools not available
- 17 Equipment/tools not adequate
- 18 Equipment/tools not calibrated
- 19 Facilities not adequate
- 20 Other

Response Details List Controls ED/EP/SP DCTs (Both OP and AW) (Released, 1.0)

- 1 Failure to identify hazards or ineffective risk controls
- 2 Failure to develop and maintain risk controls
- 3 Failure to effectively mitigate risk before applying risk controls
- 4 Risk controls ineffective
- 5 Unclear risk controls
- 6 Failure to assess risk for a new system
- 7 Failure to assess risk when revising an existing system
- 8 Failure to assess risk when developing operational procedures
- 9 Failure to maintain records of outputs of risk control assessments
- 10 Other

Response Details List Interfaces ED/EP/SP DCTs (Both OP and AW) (Released, 1.0)

- 1 Internal communication failure(s)
- 2 External communication failure(s)
- 3 Lack of interfaces
- 4 Inconsistent interfaces
- 5 Poor coordination between departments and employees
- 6 Failure of interfaces between processes or procedures
- 7 Other

Response Details List Responsibility ED/EP/SP DCTs (Both OP and AW) (Released, 1.0)

- 1 Failed to provide financial resources
- 2 Failed to provide sufficient human resources
- 3 Individual not clearly identified
- 4 Failure to ensure safety of process
- 5 Failure to oversee operations conducted under the certificate
- 6 Failed to ensure quality performance of process
- 7 Process oversight failure
- 8 Communication failure(s)
- 9 Other

Response Details List Authority ED/EP/SP DCTs (Both OP and AW) (Released, 1.0)

- 1 Process oversight failure
- 2 Unacceptable safety risk acceptance

- 3 Ineffective planning of resources
- 4 Ineffective use of resources
- 5 Ineffective control of resources
- 6 Failure to implement safety risk processes
- 7 Process owner not clearly identified
- 8 Unqualified
- 9 Other

Response Details List Process Measurement ED/EP/SP DCTs (Both OP and AW) (Released, 1.0)

- 1 Inadequate monitoring of operations processes
- 2 Ineffective evaluations of processes or systems
- 3 Undocumented or insufficient investigations
- 4 Failure to conduct audits
- 5 Ineffective audits
- 6 Failure to detect changes in the operational environment
- 7 Personnel failed to perform/follow process (procedures, guidance, etc.)
- 8 Process failed to meet desired outcome
- 9 Process oversight failure
- 10 Other

Response Details List Safety Ownership ED/EP/SP DCTs (Both OP and AW) (Released, 3.0)

- 1 Unaware of or ineffective safety policies or processes
- 2 Unaware of or ineffective safety related reporting tools
- 3 Unclear safety policy
- 4 Ineffective safety related training
- 5 Lack of safety culture
- 6 Unclear safety objectives
- 7 Other