

National Transportation Safety Board

Office of Aviation Safety

Washington, DC 20594



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OPERATIONAL FACTORS

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A. ACCIDENT

Location: Philadelphia, Pennsylvania
Date: January 31, 2025
Time: 1807 EST
2307 UTC
Airplane: Learjet 55, XA-UCI

B. OPERATIONAL FACTORS

Group Chair	Joshua Young National Transportation Safety Board Washington, D.C.
Group Member	Todd Gentry Federal Aviation Administration Washington, D.C.
Group Member	Michael Lemay Bombardier Montreal, Quebec, Canada

C. SUMMARY

On January 31, 2025, at 1807 eastern standard time, a Learjet 55 airplane, Mexican registration XA-UCI (call sign MTS056) was destroyed when it was involved in an accident in Philadelphia, Pennsylvania. The two pilots, two medical crew members, and two passengers were fatally injured. One person on the ground was fatally injured, 4 people were seriously injured, and 20 people incurred minor injuries. The airplane was operated as a Title 14 Code of Federal Regulations Part 129 air ambulance flight.

D. DETAILS OF THE INVESTIGATION

1.0 History of Flight

The flight crew's trip began on January 27, 2025, at Aeropuerto Internacional Licenciado Adolfo López Mateos (MMTO), Toluca, Mexico. The flight crew flew three legs on the 27th, three legs on the 28th, two legs on the 29th, and three legs on the 30th. On January 30th (the day prior to the accident), the last leg ended at Miami-Opa Locka Executive Airport (OPF), Miami, Florida. A review of

surveillance video from the fixed base operator (FBO) in OPF showed the flight crew departed the airport about 2115, on January 30th.¹

According to the operator, the flight crew were scheduled to fly from OPF to Northeast Philadelphia Airport (PNE), Philadelphia, Pennsylvania, where they were scheduled to pick up a patient. Then, they were scheduled to fly from PNE to Springfield-Branson National Airport (SGF), Springfield, Missouri, where they would obtain fuel before continuing to their final destination to drop off the patient and passenger.

The operator provided a risk assessment the flight crew completed for the day of the accident flight. The risk was assessed to be within the normal range and did not require further approval from management.²

Surveillance video from the FBO in OPF showed one of the flight crew members performing an external preflight of the airplane at 1038 on January 31st (the morning of the accident).³ According to the video, the airplane began to taxi from the FBO at OPF at 1148.⁴

Flight track data showed the airplane departed OPF about 1159 and continued enroute, landing at PNE about 1417. Surveillance video from the FBO at PNE revealed that the flight crew departed the airplane about 10 minutes after parking and did not perform a postflight exterior inspection.⁵ Surveillance video also showed the flight crew in the FBO having coffee and on their phones prior to departing in the FBO's crew car which was signed out by the First Officer at 1435.⁶ While on the ground at PNE the airplane was serviced with 600 gallons of Jet A aviation fuel.⁷ About 2 hours and 15 minutes after leaving the airplane the First Officer returned. The Captain returned to the airplane about 31 minutes after the First Officer. One of the pilots was observed walking around the airplane for 1 minute and 10 seconds, about 20 minutes before departing PNE.

A review of Air Traffic Control communications revealed the flight crew contacted PNE clearance delivery with a request for an instrument flight rules (IFR) clearance at 1656, which they were issued.⁸ At 1751 the flight crew called again and requested taxi from the FBO; they were cleared to taxi to runway 24.

¹ Operations Attachment 2 - Pilots Depart OPF For The Night

² Operations Attachment 1 - Accident Flight Risk Assessment

³ Operations Attachment 3 - Crew Doing Preflight at OPF

⁴ Operations Attachment 4 - Taxi Out OPF

⁵ Operations Attachment 5 - Nose View Airplane Parked at PNE & Operations Attachment 6 - Tail View Airplane Parked at PNE

⁶ Operations Attachment 7 - Crew Car Sign Out

⁷ Operations Attachment 8 - Fuel Information

⁸ Operations Attachment 9 - ATC Aircraft Accident Package

At 1804, the PNE local controller issued the flight crew a takeoff clearance for runway 24 with a right turn to heading 290° which they acknowledged. At 1806 the PNE local controller issued the flight crew an instruction to contact Philadelphia Terminal Radar Approach Control which they acknowledged.⁹ This was the last radio contact with the flight crew.¹⁰

2.0 Operator

The accident flight was operated by Med Jets, S.A. DE C.V. who was doing business as (DBA) Jet Rescue Air Ambulance. The operator was based at MMT0 in Toluca, Mexico. They were conducting operations in the United States under Operations Specifications issued by the FAA Dallas International Field Office under Title 14 Code of Federal Regulations Part 129. The operator was not authorized to operate any scheduled passenger operations, and the accident flight was a charter air ambulance flight.¹¹

According to the operator, Jet Rescue had been in operation as a Medical Transport Service since January 2007. Their service model consisted of a stand-alone flight program, Med Jets S.A. de C.V. DBA, as Jet Rescue Air Ambulance.

Jet Rescue Air Ambulance provided Aviation Medical and Administrative personnel as well as Medical Direction and Medical Control services. The aircraft were owned and maintained by Jet Rescue Air Ambulance, and the pilots and mechanics were employees of Jet Rescue Air Ambulance.

The air operator certificate (AOC) was held by Med Jets S.A. de C.V. Operational Control was maintained by Med Jets S.A. de C.V. Ground operations were provided by Jet Rescue Air Ambulance. Mechanical services were provided by an outside independent service.¹²

According to the issued operations specifications the operator was permitted to operate four airplanes into the United States, all listed airplanes were a model of Learjet (LR). A LR-35-A, LR-36-36, LR-55-55, and a LR-60-60. All of the airplanes were non-U.S. registered airplanes.¹³

According to the Mexican authorities and research conducted by this group the operator had been involved in multiple previous accidents. A fatal accident in November of 2013 in Fort Lauderdale, FL (NTSB #: ERA14FA045), a non-

⁹ Operations Attachment 27 - PNE Local Control Audio

¹⁰ Operations Attachment 9 - ATC Aircraft Accident Package

¹¹ Operations Attachment 10 - Foreign Operations Specifications A001

¹² Operations Attachment 11 - Operator Policies and Procedures Manual

¹³ Operations Attachment 12 - Foreign Operations Specifications A003

fatal accident in February of 2019 in Toluca, Mexico, and a fatal accident in November of 2023 in Cuernavaca, Mexico.

The operator provided a safety manual which outlined their safety management system and provided a risk assessment tool for both flight and medical crews.¹⁴ For more information please refer to Operations Attachment 13 - Operator Safety Manual.

3.0 Pilot in Command (PIC)/Captain

According to documents provided by the operator, the PIC was hired on August 15, 2016, and was also the Director of Operations/Chief Pilot. The operator reported that they did not have a record of the PIC ever having flown into the accident airport.

PIC Certificate Held

Mexican Issued Certificate:
Airline Transport Pilot Airplane

Mexican Issued Ratings:
PIC/SIC LR Jet, IFR, Multi-engine Airplane, Land

Language Proficiency Level 5

PIC Medical Certificate Held

Mexican Class 1 Medical issued August 6, 2024, with an expiration of February 6, 2025.

Medical Certificate Limitations:
Use of correcting lenses

PIC Training¹⁵

Learjet Series (LR-JET) Recurrent Training was completed at Flight Safety International's Tucson Learning Center in November of 2024.

- 15.5 hours of ground training covering aircraft systems, system integration, and general operational subjects
- 4.5 hours briefing and debriefing
- 6 hours simulator flight training as pilot flying

¹⁴ Operations Attachment 13 - Operator Safety Manual

¹⁵ Operations Attachment 14 - PIC Training Records

- 0 hours simulator training as pilot monitoring

Ground Training Curriculum		
Aircraft General	Landing Gear and Brakes	Weight & Balance
Powerplant	Ice and Rain Protection	Performance
Electrical	Avionics/Communications	Flight Planning
Hydraulics	Master Warning	Approved AFM/AOM
Fuel	Fire Protection	Windshear Training
Pneumatics	Oxygen	Stall Recognition and Recovery
Air Conditioning	Lighting	Procedures
Pressurization	Thrust Reversers	Crew Resource Management (CRM)
Flight Controls	Systems Review, Examination and Critique	Systems Integration

Figure 1: Ground training curriculum for LR-JET recurrent course. (Courtesy of Flight Safety International)

During the recurrent flight training the instructor remarks noted the PIC strengths included the following:

- Very good system knowledge, memory items, and limitations
- Smooth control
- Airspeed control
- Landings

During the recurrent flight training the instructor remarks noted the PIC weaknesses included the following:

- Selecting modes of operation when the autopilot is off
- English as a second language
- Tendency to react before thinking through the problem

The PIC passed all written and oral examinations and was marked proficient for all flight training maneuvers for the Learjet Series (LR-JET) Recurrent Training.

LR35/36 to LR55 recurrent differences training was completed at Flight Safety International's Tucson Learning Center in November of 2024.

- 2.5 hours of ground training

Ground Training Curriculum		
Aircraft General	Air Conditioning	Hydraulics
Electrical	Flight Controls	Oxygen
Fuel	Performance/Weight and Balance	Landing Gear and Brakes
Powerplant	Avionics/Communications	Pressurization
Pneumatics	Lighting	Fire Protection
Ice and Rain Protection	Master Warning	Thrust Reversers

Figure 2: Ground training curriculum for LR35/36 to LR55 recurrent differences course. (Courtesy of Flight Safety International)

The PIC passed the written test at the completion of this training with a remark from the instructor stating the PIC's written test score was 100%.

PIC Flight Time¹⁶

The PIC's logbook was not found in the wreckage and requests to the law office representing the PIC's family for the PIC's flight time received no response. The operator was able to provide the previous 90 days of flight time for the PIC and an undated resume¹⁷. All flight time provided for the previous 90 days was accomplished in the accident airplane. Neither the PIC's night nor instrument currency could be established based on the flight times provided.

Total Time (Resume): 9200

Total Jet Time (Resume): 8500

Total Captain Time (Resume): 5000

Total Time (previous 90 days): 132.5

Total Time (previous 30 days): 50.9

Total Time (previous 72 hours): 16.7

PIC 72-Hour History

A list of questions to establish the PIC's 72-hour history was sent to the law office representing the PIC's family on July 21, 2025, with a requested response date of August 21, 2025. On September 19, 2025, a representative of the firm responded to a request for an update stating they had received the answers to the questions posed by the NTSB and an associate would be in contact soon. The associate contacted the NTSB on September 23, 2025, to which the NTSB responded requesting the family responses be submitted in writing. No further communications from the associate were received. The NTSB Office of General Counsel reached out to the law office on October 14 and November 19 of 2025 and again February 18, 2026, with no response. Since responses to these questions were not received, the PIC's 72-hour history could not be established.

4.0 Second in Command (SIC)/First Officer

The SIC was hired by the operator on December 6, 2023. The operator reported that they did not have a record of the SIC ever having flown into the accident airport.

SIC Certificate Held

Mexican Issued Certificate:
Commercial Pilot Airplane

Mexican Issued Ratings:

¹⁶ Operations Attachment 15 - PIC Flight Time

¹⁷ Operations Attachment 24 - PIC and SIC Resumes

SIC LR Jet 35/36 TO 55, IFR, Single Engine Airplane, Multi-engine Airplane, Land

Language Proficiency Level 4

SIC Medical Certificate Held

Mexican Class 1 Medical issued November 12, 2024, with an expiration of May 12, 2025.

Medical Certificate Limitations:
None

SIC Training¹⁸

Learjet Series (LR-JET) Recurrent SIC Training was completed at Flight Safety International's Tucson Learning Center in May of 2024.

- 15.5 hours of ground training covering aircraft systems, system integration, and general operational subjects
- 4.5 hours briefing and debriefing
- 7 hours simulator flight training as pilot flying
- 0 hours simulator training as pilot monitoring

Ground Training Curriculum		
Aircraft General	Landing Gear and Brakes	Weight & Balance
Powerplant	Ice and Rain Protection	Performance
Electrical	Avionics/Communications	Flight Planning
Hydraulics	Master Warning	Approved AFM/AOM
Fuel	Fire Protection	Windshear Training
Pneumatics	Oxygen	Stall Recognition and Recovery Procedures
Air Conditioning	Lighting	Crew Resource Management (CRM)
Pressurization	Thrust Reversers	Systems Integration
Flight Controls	Systems Review, Examination and Critique	

Figure 3: Ground training curriculum for LR-JET recurrent SIC course. (Courtesy of Flight Safety International)

During the recurrent flight training the instructor remarks noted the SIC strengths included the following:

- Great attitude
- Hard Worker
- Better instrument cross check skills during the later simulator sessions

During the recurrent flight training the instructor remarks noted the SIC weaknesses included the following:

- This was his first ever simulator event.

¹⁸ Operations Attachment 16 - SIC Training Records

- He took a bit of time to try and get used to the motion.
- His lack of recent experience in the LR35 was evident.
- A little weak on instrument cross check skills

In the weaknesses section for the final simulator session the flight instructor noted the SIC had no weaknesses for a SIC pilot.

The SIC passed all written and oral examinations and was marked proficient for all flight training maneuvers for the Learjet Series (LR-JET) Recurrent SIC Training.

LR35/36 to LR55, initial differences training was completed at Flight Safety International's Tucson Learning Center in May of 2024.

- 3 hours of ground training

Ground Training Curriculum		
Aircraft General	Air Conditioning	Hydraulics
Electrical	Flight Controls	Oxygen
Fuel	Performance/Weight and Balance	Landing Gear and Brakes
Powerplant	Avionics/Communications	Pressurization
Pneumatics	Lighting	Fire Protection
Ice and Rain Protection	Master Warning	Thrust Reversers

Figure 4: Ground training curriculum for LR35/36 to LR55 initial differences course. (Courtesy of Flight Safety International)

The SIC passed the written test at the completion of this training with a written test score of 100%.

SIC Flight Time¹⁹

The SIC's logbook was not found in the wreckage and requests to the law office representing the SIC's family for the SIC's flight time received no response. The operator was able to provide the previous 90 days of flight time for the SIC and an undated resume²⁰. All flight time provided for the previous 90 days was accomplished in the accident airplane. Neither the SIC's night nor instrument currency could be established based on the flight times provided.

Total Time (resume): 2600

Total Instrument Time (resume; unknown if actual or simulated): 300

Total Time (previous 90 days): 78.25

Total Time (previous 30 days): 50.9

Total Time (previous 72 hours): 16.7

¹⁹ Operations Attachment 17 - SIC Flight Time

²⁰ Operations Attachment 24 - PIC and SIC Resumes

SIC 72-Hour History

A list of questions to establish the SIC's 72-hour history was sent to the law office representing the SIC's family on July 21, 2025, with a requested response date of August 21, 2025. On September 19, 2025, a representative of the firm responded to a request for an update stating they had received the answers to the questions posed by the NTSB and an associate would be in contact soon. The associate contacted the NTSB on September 23, 2025, to which the NTSB responded requesting the family responses be submitted in writing. No further communications from the associate were received. The NTSB Office of General Counsel reached out to the law office on October 14 and November 19 of 2025 and again February 18, 2026, with no response. Since responses to these questions were not received, the SIC's 72-hour history could not be established.

5.0 Airplane Information

The airplane was a 1982 Learjet 55. The weight and balance for the accident flight was provided by the operator and indicated the airplane had a takeoff weight of 20,830 pounds, a center of gravity of 376.66, and a % of mean aerodynamic chord (MAC) of 16.85%.²¹ The airworthiness file provided by the Mexican Agencia Federal De Aviación Civil (AFAC) showed that the weight and center of gravity were within the operating envelope.²²

Based on the weight and balance provided and a Learjet 55 checklist found in the wreckage²³, which showed a takeoff trim table, the takeoff trim should have been set to about 5.5°. The pitch trim actuator was found in the wreckage and when measured it equated to a pitch trim indication of 3.97°. ²⁴ Based on ADS-B data and performance calculations the airframe manufacturer was able to estimate the control forces the crew would have felt on the yoke throughout the flight at differing pitch trim settings²⁵. While the exact pitch trim settings for each ADS-B data point are unknown the maximum force the crew would have needed to maintain level pitch (zero flight path angle) from the takeoff pitch trim setting to the found pitch trim setting was 53.5 lbs. Based on the final ADS-B data point and the pitch trim setting as found in the wreckage the airplane would have been trimmed slightly nose up at that speed, weight, and center of gravity, needing about 12 lbs of pitch down force to maintain level pitch. For more details on the estimated pitch control forces please reference Operations Attachment 26 - Estimated Pitch Control Forces.

²¹ Operations Attachment 18 - Accident Flight W&B

²² Excerpts From AFAC XA-UCI Airworthiness File

²³ Operations Attachment 20 - Checklist Page from Wreckage with Pitch Trim Table

²⁴ Airworthiness Group Factual Report

²⁵ Operations Attachment 26 - Estimated Pitch Control Forces

6.0 Flight Safety International (Tucson) Personnel Interview Summaries

Of the four instructors who worked with the accident pilots during their last training events, two of them still worked for Flight Safety International and both were interviewed.

The first instructor interviewed was the ground instructor for both pilots and did not complete any simulator events with either pilot, only ground training. He reported that during their training they use multiple manuals and handbooks, as well as checklists and items available from the airplane manufacturer and internal documents, such as flash cards, to assist with pilot training. These documents are available to the students and instructors in an online format. He recalled working with both accident pilots during their ground training. When asked if crew resource management (CRM) was taught during recurrent training he reported that CRM is sprinkled throughout the ground school but did not have a specific CRM lesson. He reported that the FAA principal operations inspector (POI) assigned to the training facility would sit in on his classes on occasion to observe the class, but he could not recall if the POI had ever sat in on a class that had pilots from the accident operator. When asked if the classes he taught included the calculation of weight and balance, he confirmed that they do, and when asked if they differentiate between medical and passenger carrying flight weight and balance, he reported that they use a generic Learjet weight and balance. When asked if he used company specific manuals during the training he taught, he reported that he used the manufacturer's manuals and checklists and that the company may provide their checklists to be used in the simulator but not during the ground school portion. When asked about the experience level of the pilots he had seen from the operator he reported that they seemed "normal... they all seemed to be proficient and well prepared and the typical pilot that goes through my class."²⁶ When asked if spatial disorientation, and/or illusions in flight are taught or discussed during ground training he reported that they are not. He continued that both pilot's English proficiency was appropriate.

The second instructor interviewed was an instructor/examiner who performed one simulator session with the PIC during his most recent recurrent training. He reported that during the simulator sessions they used the manufacturer's flight manuals and checklists and followed a curriculum developed by Flight Safety International. He reported that recurrent training typically took place over 3 simulator sessions. These sessions included 1 hour of pre-briefing, 2 hours of simulator work per client, and 30 minutes of debriefing. He did not recall either of the pilots from memory but did state that he had a chance to review the training record for the pilot he worked with prior to the interview. He

²⁶ Operations Attachment 22 - Combined FSI Interviews Pg. 18 Lines 16-19

continued that during the simulator session with the accident PIC they covered a multitude of areas which included preflight inspection, normal and rejected takeoff, departures, crosswind takeoffs, steep turns, unusual attitude recovery, multiple approaches, and multiple different malfunctions. When asked about CRM he reported that the elements of CRM are woven throughout the training from the brief prior to entering the simulator to the debrief after the event. When asked if he had seen any of the accident operator's manuals, he reported that he had not seen their manuals. He was asked to expand upon a comment he had made in the pilot's flight training record as a weakness which stated "selecting modes of operation when AP is off." He stated "Absolutely. So when the autopilot is off, what we like to do here in FlightSafety, if the autopilot is off, the pilot flying the aircraft should ask the pilot monitoring to select the modes of operation. That allows the pilot to concentrate on actually flying the aircraft. So what happens is, if the autopilot's off and the pilot flying goes to select modes of operation, it's distracting him from flying the aircraft, which typically results in deviations of altitudes, speeds, and headings."²⁷ He was then asked if stalls were covered in the simulator lessons and he reported that they were and that they did not go to a full stall but teach to initiate recovery at the first indication of a stall. When asked if spatial disorientation, and/or illusions in flight are taught or discussed during the simulator sessions he reported that they performed upset and unusual attitude recovery but did not talk specifically about spatial disorientation or visual illusions that may be encountered in flight. He reported that during the simulator session they performed takeoffs in both visual meteorological conditions (VMC) and instrument meteorological conditions (IMC) during both the day and night. For the IMC training he reported that the weather is set for minimums of 1600 ft. runway visual range (RVR). When asked about trim usage during takeoff he stated, "you need to use a lot of trim on takeoff."²⁸

7.0 FAA International Field Office Interview Summaries

The operator was assigned to the Dallas International Field Office (IFO) of the FAA. Four personnel with the Dallas IFO who were involved in the oversight or management of the operator were interviewed as part of this investigation. They were the Principal Operations Inspector (POI), both Office Front Line Managers (FLM), and the Office Manager.

Principal Operations Inspector

The POI had been with the FAA for 6 years and had been assigned to the Dallas IFO since June of 2023. Prior to his assignment at the IFO he was a general aviation POI at a FAA Flight Standards District Office (FSDO). He

²⁷ Operations Attachment 22 - Combined FSI Interviews Pg. 48 Lines 12-20

²⁸ Operations Attachment 22 - Combined FSI Interviews Pg. 56 Lines 4-5

reported that he had 18 Part 129 operators in his portfolio. He continued that of his Part 129 operators the majority of them were unscheduled.²⁹ When asked how surveillance is conducted on foreign operators, he stated that they were limited to ramp inspections and that they were not able to perform enroute inspections on foreign aircraft whether the leg was a foreign or domestic leg of flight. He continued that surveillance of these operators does not have to be done solely by himself, and that he could ask for assistance from another IFO or from a FSDO near the airplane's destination but that he had not done this before. When asked if there was a requirement to perform ramp checks or other surveillance on the operators that he oversaw he stated "Oh, I'm not sure."³⁰ When asked if he was able to travel to perform surveillance or ramp checks he stated that he had not tried. When asked to define the Heightened Surveillance List (HSL) he stated "based on the history and events that might be taking place within a particular operator's business or home country or something like that, they may be put on the Heightened Surveillance List. Which basically indicates to us at the IFO or other, you know, FSDO-CMO, these are operators that need more attention focused on them."³¹ When asked how an operator is added to the HSL he stated that it was driven by another department within the FAA and that he was not sure what the requirements or drivers were. He added that he did not currently oversee any operators who were on the HSL. When asked if there was a surveillance plan in place for the 2025 fiscal year, he reported that there was no specific tasking for surveillance. He reported that of the 18 Part 129 operators he oversaw, only 1 had U.S. registered aircraft and all others operated foreign registered aircraft. When asked what the difference was in surveillance between a U.S. and non-U.S. registered aircraft, he stated that he didn't remember. When asked how an issue found during FAA surveillance would be addressed, he stated that they would normally reach out to the responsible state government official or their foreign counterpart if one was assigned. He reported that he had been the POI for the accident operator for the entirety of his time at the IFO after completing training which was about 2 years. When asked if he knew how many accidents the operator had been involved in, he stated that he did not. He also reported that the operator, and any unscheduled Part 129 operator, was required to notify the IFO before operating in the U.S. per Operations Specification (OPS Spec) A001 but that they did not make this notification prior to the accident flight. When asked if he knew if any ramp checks had been completed on the operator, he responded that he was not aware of any and when asked if he checked the system on any sort of regular basis to see if any surveillance had been conducted, he stated that he did not.

²⁹ Operations Attachment 23 - Combined FAA IFO Interviews Pg. 12 Line 5

³⁰ Operations Attachment 23 - Combined FAA IFO Interviews Pg. 15 Line 12

³¹ Operations Attachment 23 - Combined FAA IFO Interviews Pg. 16 Lines 7-14

Front Line Manager (POI Direct Supervisor)

The FLM and direct supervisor of the POI had been with the FAA for almost 10 years and had been with the IFO since June of 2018. Prior to working at the IFO he was an inspector at a local FSDO and prior to entering management he was a POI at the Dallas IFO. When asked what options were available for surveillance of Part 129 operators, he responded stating that the only option is a ramp check and noted that they are not able to issue a condition tag grounding the aircraft. He continued that if the principal inspector was unable to perform the ramp check themselves, they could request another IFO or a local FSDO do a ramp check but that this had to be coordinated between the Dallas IFO management and the management of the other office to assure manpower availability. He reported that for a Part 129 operator that is operating non-U.S. registered aircraft the principal maintenance and avionics inspectors have very little interaction, they're more of a point of contact for the POI to go to if they have questions. This is due to the fact that non-U.S. registered aircraft maintenance oversight falls to the foreign aviation authority. When discussing the HSL he reported that there are automatic triggers that would require an operator to be placed on the HSL and outside of these triggers a principal inspector could request an operator be placed on the HSL. He stated multiple times that the ops specs were largely based on the operator's needs and reiterated that the ops specs issued by the FAA would parallel the authorizations approved by the operator's home aviation agency but would not issue an ops spec that does not have a parallel authorization from the home aviation authority. When asked how the IFO develops a surveillance plan he reported that they "don't run a surveillance plan"³² and that ramp checks are their only means of surveillance. When asked how the FAA confirms that any issues they find during surveillance are addressed, he reported that either the operator or foreign aviation authority would notify the IFO as to the resolution of the issue. When asked if there was a minimum number of ramp checks per year that an operator needed, he responded stating "I don't think there's a minimum... I would say they're doing at least one. But I don't know that there is a minimum. That's all just risk based."³³ When asked if he expected the inspectors, he oversaw to have knowledge of accidents an operator they oversaw was involved in he stated that "I'd like to think they know it, but it depends on where the accidents happened and whether they were reported to us."³⁴ When asked if there is an expectation that an operator reports when they have an accident, he stated that he was not aware of any expectation. When asked what recourse the FAA has to address an operator not complying with their issued ops specs, he reported that they could send warning letters, suspend the ops specs, or terminate the ops specs.

³² Operations Attachment 23 - Combined FAA IFO Interviews Pg. 114 Line 12

³³ Operations Attachment 23 - Combined FAA IFO Interviews Pg. 122 Lines 19 - 21

³⁴ Operations Attachment 23 - Combined FAA IFO Interviews Pg. 126 Lines 21 - 24

When asked if he knew if any ramp checks had been completed on the operator, he stated that he did not.

Front Line Manager

The other FLM at the Dallas IFO was interviewed as there are only 2 FLMs and when the direct supervisor is absent this FLM would assist the principal inspectors (PI) with any issues that may arise. He joined the FAA in 2003 and had been assigned to the Dallas IFO since 2005. When asked how inspectors conduct surveillance on Part 129 operators he stated they performed ramp checks. He continued stating "And that is mostly done -- well, probably all the time done to our scheduled operators. It's very seldom that we can catch one of the on-demand or charter operators."³⁵ When asked if there were surveillance plans for unscheduled Part 129 operators he stated "For unscheduled operators? No, we don't."³⁶ When asked if there was an expectation for the inspectors assigned to him to perform ramp checks on their assigned operators he stated "Unscheduled? Like I said, very, very, very seldom that we do that, because like I said it's hard for us to pin them down."³⁷ When asked if he expects his inspectors to know when an operator assigned to them has had an accident, he reported that it is not a requirement. When asked if an operator was required to notify the IFO when they've had an accident, he said it was encouraged. When asked how an inspector's oversight performance of unscheduled Part 129 operators who operate non-U.S. registered aircraft is assessed he said "I don't gauge -- we don't gauge that for the non-scheduled. We gauge the performance of the inspector on everything else they do, not the unscheduled operators in particular."³⁸ When posed with a scenario of an inspector who is only assigned unscheduled Part 129 operators who operate non-U.S. registered aircraft and asked how that inspectors performance would be gauged he stated "We can't."³⁹ When asked what actions would be taken if an inspector found an airplane in an unairworthy condition during a ramp check he reported that the crew would be advised and if they chose to continue to fly they could, as the IFO does not have the ability to ground the airplane. He continued that he would notify the airplane's home country aviation authority of the aircraft's condition. When pressed on the matter and asked if a crew could continue to fly in the National Airspace System (NAS) with a known unairworthy aircraft he reported that yes, they could. He also reported that the operator's ops specs could be suspended or terminated. When asked how the operations inspectors are making sure their operators were complying with the requirement to notify the

³⁵ Operations Attachment 23 - Combined FAA IFO Interviews Pg. 152 Lines 22 - 25

³⁶ Operations Attachment 23 - Combined FAA IFO Interviews Pg. 155 Line 14

³⁷ Operations Attachment 23 - Combined FAA IFO Interviews Pg. 158 Lines 15 - 17

³⁸ Operations Attachment 23 - Combined FAA IFO Interviews Pg. 170 Lines 3 - 6

³⁹ Operations Attachment 23 - Combined FAA IFO Interviews Pg. 171 Line 1

IFO prior to entering the NAS he responded, saying that there is no requirement for the inspectors to check, it is the operator's responsibility to tell the IFO. When asked if there was any requirement or expectation for POI's to check if their assigned Part 129 operators are complying with their notifications to the IFO of operations in the U.S. NAS, required by ops spec A001, on a recurring basis he said "No. The requirement is for the operator to notify us that they're flying."⁴⁰ He continued "There is no requirement for us to check monthly, quarterly, whatever, that we get the notification. The requirement is for the unscheduled, the requirement is they need to notify us before they operate to the U.S."⁴¹ and that there is no guidance or requirement for POIs to verify that operators are complying with their notification requirements of ops spec A001. When asked if there was a recurring list of all international flights into the U.S. by foreign registered aircraft provided to the IFO for POIs to review he reported that they are not provided with anything of that nature. When asked "How is risk assessed then for a non-scheduled, non-U.S. registered operator then?" he responded stating "We don't. I mean because there is not part of the work program."⁴² When asked where the risk-based decision-making tool was located he reported that it is in the SAS program. He continued that after entering information into the program it gives the PI a number as to the operator's risk level which the PI will use to inform their decision as to whether or not a ramp check should be conducted.

Office Manager

The Dallas IFO office manager was interviewed as he was the office manager at the time of the accident. He had been employed by the FAA for 19 years and had been at the Dallas IFO for about 4 years. Prior to the IFO he had been an office manager at a FSDO and prior to that had been a FLM and PI at another FSDO. When asked if there was any requirement to perform ramp checks for unscheduled Part 129 operators of foreign registered aircraft, he reported that there was not. When asked if a work plan had to be developed for these operators' surveillance, he reported that there was not. When asked if there was any guidance saying that the IFO does not need to develop a surveillance plan for these operators he responded stating there was a "lack of guidance that says we're supposed to."⁴³ When asked if there was a requirement in a POIs work plan to check if an operator is complying with the notification requirements of ops spec A001 he reported that there is no requirement and that he was not aware of an FAA source where a POI could easily check to see what foreign aircraft had operated in the U.S. If they wanted to check a POI would have to search specific registrations using a 3rd party vendor to check if

⁴⁰ Operations Attachment 23 - Combined FAA IFO Interviews Pg. 182 Lines 18 - 19

⁴¹ Operations Attachment 23 - Combined FAA IFO Interviews Pg. 183 Lines 9 - 13

⁴² Operations Attachment 23 - Combined FAA IFO Interviews Pg. 208 Lines 11 - 14

⁴³ Operations Attachment 23 - Combined FAA IFO Interviews Pg. 239 Line 3

that aircraft entered the U.S. without a notification. When asked if the IFO would get notification if an operator they oversee was involved in an accident outside the U.S., he reported that it would depend on if the foreign civil aviation authority reported it to them or not. When asked how the FAA FLMs gauged a PI's performance when it comes to the oversight of the unscheduled Part 129 operators of foreign registered aircraft assigned to them he stated "We wouldn't, because he has no responsibilities for oversight of a non-U.S., non-scheduled operator."⁴⁴ When asked if an unairworthy foreign aircraft operating under part 129 can continue to operate in the U.S. NAS he stated "Yes. We can't stop them."⁴⁵

8.0 FAA International Field Office Oversight

The Dallas IFO was responsible for issuing the Part 129 Operations Specifications and were charged with monitoring and overseeing the operator when they were operating in the United States.

FAA Order 8900.1, Flight Standards information management System, Volume 12, Chapter 4, covered Title 14 CFR Part 129 Operations and was reviewed. Section 10 of this chapter covered ramp inspections and other surveillance for 14 CFR Part 129 and 375 Foreign Air operators. Any records of ramp inspections or other surveillance activity would be stored in the FAA Safety Assurance System (SAS) via an activity recording (AR) code. A request to the FAA was made for all recorded ramp checks or surveillance conducted on the operator based on the AR codes listed in section 10. They responded stating "A search was completed in SAS and there are no records prior to the accident."

After completing interviews of IFO personnel who were involved with or oversaw the operator the FAA was asked multiple questions for clarification. One of these was for the guidance provided to IFO inspectors on how and when to conduct surveillance for Part 129 unscheduled non-US registered aircraft. They responded, stating that general guidance is provided in FAA Order 8900.1, Volume 12 International Aviation, Chapter 4 14 CFR PART 129 Operations, Section 10 Ramp Inspections and Other Surveillance for 14 CFR Parts 129 and 375 Foreign Air Operators. They continued stating "The operator is required to notify the FAA prior to arrival to/departure from the United States. The notified information is added to the Safety Assurance System (SAS) to schedule a ramp inspection. SAS is the FAA's oversight tool to perform certification, surveillance, and continued operational safety. SAS includes policy, processes, and associated software used to capture data when conducting oversight. It includes job aids and applicable Data Collection Tools

⁴⁴ Operations Attachment 23 - Combined FAA IFO Interviews Pg. 248 Lines 16 - 17

⁴⁵ Operations Attachment 23 - Combined FAA IFO Interviews Pg. 250 Lines 8 - 9

(DCTs) used by IFO inspectors when conducting surveillance on part 129 unscheduled operators.”

Section 10.4 discussed surveillance and stated:

Aviation safety inspectors (ASI) will conduct surveillance of foreign air operators and their aircraft and operations.

a) The surveillance task is to determine compliance with the regulations and the foreign air operator’s operations specifications (OpSpecs).

b) Conduct surveillance utilizing Risk-Based Decision Making (RBDM). When utilizing RBDM for surveillance, items that principal inspectors (PI) must consider include, but are not limited to, the following:

1) Prior surveillance history and frequency.

2) Type and size of aircraft.

3) Enforcement history.

4) Size and scope of operation.

5) Heightened Surveillance List (HSL).

6) Written (i.e., email, letter) feedback from the Transportation Security Administration (TSA) International Industry Representative (IIR) (formerly referred to as the International Principal Security Inspector). Suggested topics to review (in writing and at least annually) with the TSA include:

i. FAA-issued OpSpecs via which the FAA authorized the foreign air carrier to operate into new airports to be used for scheduled passenger operations or all-cargo operations, or with new aircraft make, model, and series (M/M/S) or configurations since the last RBDM.

ii. Any issues, concerns, and/or changes (i.e., downgrade of the State of the Operator of the foreign air carrier from the International Aviation Safety Assessment (IASA) Category (CAT) 1 to IASA CAT 2) that may affect each other’s oversight responsibilities.

7) Other pertinent information.

c) If a foreign air operator experiences a series of safety-related accidents, incidents, violations, or complaints, the International Field Office (IFO) manager holding the foreign air operator’s

OpSpecs will initiate surveillance as necessary to resolve any safety deficiencies.

Section 10.7.2, planning and work programs for charter (nonscheduled) 14 CFR Part 129 and 375 operators stated:

a) When an IFO receives notification of charter flight operations as required in 14 CFR part 129 OpSpec A001, or a 14 CFR part 375 flight operation, a principal inspector (PI) will utilize Risk-Based Decision Making (RBDM) to determine if a ramp inspection should be conducted. If the ramp inspection will be conducted in a location that would require travel, the PI will consult the IFO management team to determine if the ramp inspection will be conducted by IFO inspectors, or if geographic surveillance should be requested. If the IFO management team has determined that the inspection cannot be accomplished by the IFO inspectors, the PI will request geographic surveillance in accordance with subparagraph 10.9b).

b) Offices will accept geographic requests from IFOs. Activities are locally created and either accomplished or recorded as RNA

The FAA was asked why there was no requirement for a surveillance plan for Part 129 unscheduled operators who are operating non-US registered airplanes. They responded stating "Due to the inherently unpredictable nature of unscheduled operations, oversight is not calendar-based but is instead conducted through a risk-based, event-driven surveillance approach. Surveillance planning is initiated based on flight notifications and identified safety concerns, rather than fixed schedules."

They were also asked what guidance is given to IFO inspectors as to what oversight should be conducted on Part 129 unscheduled operators who are operating non-US registered airplanes. They responded, stating:

Oversight includes not only ramp inspections, but also evaluation of operational authorizations, coordination with the State of Registry and civil aviation authorities when applicable, follow-up of incidents/accidents, and monitoring of corrective actions, using the same ramp inspection guidance and SAS tools applied to part 129 surveillance.

FAA Order 8900.1, Volume 12 INTERNATIONAL AVIATION, Chapter 4 14 CFR PART 129 OPERATIONS, Section 10 Ramp Inspections and Other Surveillance for 14 CFR Parts 129 and 375 Foreign Air Operators, Figure 4-10A Foreign Air Operator Ramp Inspection Job Aid, is based on the ICAO Manual of Procedures for Operations Inspections, Certification and

Continued Surveillance (Doc 8335) for the inspection of foreign operators. The Job Aid has been incorporated into the SAS DCT for inspectors to use during ramp inspections.

While FAA IFO PIs now have access to a risk based decision tool through the SAS program, the FAA reported that "Scheduled/Unscheduled Part 129 operators were not incorporated into SAS until Summer 2025 (July-August 2025)." The FAA also reported that "Operator historical data is available as far back as PTRS entries will allow. SAS allows both task and activity-related data associated with part 129 to be viewed using the office workload list (OWL) in SAS."

The NTSB reviewed the SAS Risk Profile Assessment Tool (RPAT) which the FAA described as "an analysis tool for all information related to the Risk Profile. The RPAT uses a series of visual reports to help the PI and management understand the Assessment Priority Index (API) and Certificate Holder Index (CHI) values associated with a certificate holder." During this review the FAA provided a table showing the inputs to the RPAT which included automated inputs to include incidents, NTSB fatal accidents, and NTSB non-fatal accidents. The FAA was queried where this information was derived and they responded stating "the source for incidents in Phase 3 was the FAA Accident and Incident Data System (AIDS), in Phase 4 the source is activity recording in SAS. Accident information in the risk profile is derived from NTSB accident reports." When asked how accident information is collected for Part 129 international operators the FAA reported that it is collected using the same information.

FAA Order 8900.1, Flight Standards information management System, Volume 12, Chapter 4, Section 13 focused on the HSL. It stated the HSL is used to identify increased surveillance requirements for foreign air carriers operating within the United States under Title 14 of the Code of Federal Regulations (14 CFR) part 129. Section 13.4.2, additions and deletions, stated the IFOs are the primary source for requests to add or remove Part 129 foreign air carriers from the HSL.

Section 13.4.3, Criteria, stated

Specific criteria, when applied to a foreign air carrier's operations, may identify a foreign air carrier as representing a higher level of potential risk. While certain conditions will require the foreign air carrier being added to the HSL, other criteria must be evaluated when determining if an air carrier should be added or removed.

a) Mandatory Addition to the HSL. Two conditions will require the responsible PI to request that the foreign air carrier is added to the HSL:

1) A foreign air carrier operating scheduled service from an International Aviation Safety Assessment (IASA) Category (CAT) 2 country. The foreign air carrier will remain on the HSL until the country is upgraded to CAT 1 status.

2) New entrant foreign air carriers operating scheduled services into U.S. airspace. New entrant foreign air carriers will remain on the list for a minimum period of 1 year from the issuance of OpSpecs. After the first year, those foreign air carriers will be evaluated to determine if they continue to meet the requirements to operate in U.S. airspace.

Note: New entrant foreign air carriers are those that have not previously operated to the United States. This does not include on-demand charters that come to the United States.

b) Specific Evaluation Criteria. The following foreign air carrier information must be evaluated to determine if there is enough data about them to be added to the list. Any one item on this list may not be enough to require that the foreign air carrier be added to the HSL.

1) Foreign air carriers undertaking significant change of scope and type of operations (e.g., charter (nonscheduled) to scheduled operations, cargo to passenger-carrying, addition or removal of aircraft type, and/or major change of route structure);

2) Labor disputes;

3) Financial crisis;

4) Reduction in work forces;

5) Merger or takeover;

- 6) Turnover in key personnel;
- 7) Relocation/closing of facilities;
- 8) Political disturbance;
- 9) Foreign air carriers requiring additional surveillance due to safety concerns; and
- 10) Foreign air carriers banned by other International Civil Aviation Organization (ICAO) Member States.

FAA Order 8900.1, Flight Standards information management System, Volume 12, Chapter 2, Section 1 discussed the FAA International Aviation Safety Assessment Program (IASA). It stated, "Under the FAA's IASA program, the FAA determines whether another country's oversight of the country's air carriers that operate or seek to operate to and from the United States, or codeshare with a U.S. air carrier, complies with safety standards established by the International Civil Aviation Organization (ICAO)." The stated purpose of the IASA program is to "ensure that all foreign air carriers operating to or from the United States, or codesharing with a U.S. air carrier, are properly certificated and subject to safety oversight provided by a Civil Aviation Authority (CAA) in accordance with ICAO standards." It defined the two categories as CAT 1 and CAT 2. CAT 1 countries "meet and comply with ICAO minimum international aviation safety standards for oversight of civil aviation." CAT 2 countries "do not meet the ICAO minimum international aviation safety standards."

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