

I am responding as a private citizen, however, my duties as an FAA Inspector at the AMR-CMO as the FAA ASAP ERC Representative for the American Airlines maintenance and engineering ASAP program provides me with knowledge and insight regarding the ASAP process. The following is my concern regarding the intent of developing a specific order to address privacy regarding ASAP reports.

Though not referred to in the ASAP Advisory Circular (AC) 120-66A, the American Airlines Maintenance and Engineering Memorandum of Understanding (MOU) paragraphs 2.3 and 2.8 address the sending of a copy of all ASAP reports directly to the NASA Aviation Safety Reporting System (ASRS) in accordance with FAA AC 00-46D as part of their program. If ASAP reports are sent to NASA directly from operators, as a part of their ASAP program, it would render any attempt by the FAA to keep information private, moot. Therefore, if the operators share this information with NASA, thereby voluntarily making it public information, any attempt by the FAA to protect the information would be a waste of time. I do not feel there is a need to adopt an order addressing the intent of Docket Number 2002-13236.