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I am a retired FAA Airworthiness Inspector. My aviation career has spanned fifth three years in this industry. My last ten was spent in the FAA, four in the military at the beginning and the remainder in the industry. This is not to tell "war stories". It is to explain my prospective of the Aviation Industry in the United States.

My career was pretty much spent in equal parts as an Airframe and Engine Mechanic and an Inspector. On through management positions on up to V. P. of a small airline. The reason I am writing this is because I have just fished reading Docket No. FAA-19995836 The rewrite of FAR145, it took about eight years but I thought it came out pretty well until one point.

My problem with this re write has to do with "INSPECTION". History is a great teacher *if we are willing to learn from it*. Unfortunately the FAA keeps right on trying to "reinvent the wheel". The first twenty-five years of aviation we learned maintaining an aircraft is not an easy task. The Department of Commerce established the CAA. Not only did pilots require certification but mechanics did also.

This was to establish qualification criteria to perform these duties. We then specialized and qualified in different types of machines and specialties, as the aircraft became more complex. By 1958 the system had grown. A category known as "Inspector" in aircraft maintenance had become a responsible position, with some authority.

In 1958 the re-writing of our aviation laws brought some changes is aircraft maintenance. With the airlines insistence a new terminology came into being. It was and is called RII (Required Inspection Item). Most of us that were in Maintenance at that time did not think much about it. Some were even very happy with it (management). The Inspection staff could now be cut, and the payroll cut. It simply meant that a mechanic could "inspect a co workers" job assignment. After all we both held Federal Aviation Certificates. Even though we could be "drinking buddies", brothers our

children's godfathers. A door taking human nature out of the "safety" picture had been opened.

Between that time and now airlines and repair stations have been cutting cost. One of the ways to cut cost is RII. "Why do the airlines and repair stations need a large inspection staff". An Inspector is non-productive and really does not produce **anything**. This all started out, with one simple job function on "*in service aircraft*" on the flight line. The installation of a pump, generator or fuel control could be done without a *non-productive inspector* being called.

Until recently we had a "safety valve". "*Out of service aircraft*" were still inspected and repaired with the responsible acceptance of a Qualified Experienced Inspector. This was done on aircraft in "C" and "D" overhaul checks. This was the soul function of the Qualified Inspector. It was to Inspect (The *inspection shake part* of the process) the aircraft at the beginning of the service. Inspect; the service, repair and modification process and aircraft close up, right on up to "test flight".

Over the years RII has replaced and diluted the true Inspection function. We **are** now **diluting aviation safety** further. I was fairly satisfied with the re-write of FAR145. A Foreign Repair Station is now a part and parcel of the FAR. As I read along "Supervisor and Inspection requirements" were still in place. Then I **came** up with **the RII verbiage**. I called some friends in Washington. I found out that "yes", it is true that the FAA has taken the **position of JAA**, which also espouses RII.

We **are** looking at **Quality Assurance** as a savior to all things. The industry has not yet learned the interpretation of the terminology. It has two functions; one is to "**Assure maintenance functions BEFORE** the maintenance process", by review of proper procedures and practices. The second is to "**Assure through Quality Control** that, that process has been accomplished". It is during this process that mistakes are caught and corrected. Then Quality Assurance **audits** the whole process on completion.

The key to this whole process is the "Inspection Shake" of an aircraft. If the mechanic is going to "open, clean, inspect, write up discrepancies, service, repair, and countersign what is written"; we are in for big troubles. An Inspector on an airline or repair stations payroll is not just another body

collecting a salary. They are more likely the most qualified personnel on the payroll.

Inspecting and accomplishing special inspections and procedures every day creates a **specialist**. A person that can use special equipment, especially a mirror and a magnifying glass AND a person *that knows where to look*. I have grounded several aircraft in my career with a cracked landing gear trunnion, cracked pylons (3). Crossed aileron cables after an installation. All on major airlines. The three mechanics that installed the cable did not believe me. I had to prove to them, the cables was wrapped twice around each other. What would RII have done in this case? Two of the cracked pylons were found after a mechanic did a walkaround. All on major FAR121 carriers

One major foreign airline that is also a Foreign FAA Certified Repair Station; has been using the RII process for years on US airline-certificated aircraft being overhauled. Its technicians do not even hold their own government's certificates, let alone FAA. Within the past few years another and then another have done the same thing. The FAA has taken the position that as long as a person is trained they are "Qualified". This is not living in the real world. *There is no substitute for experience, none what so ever.* Doctors and Lawyers "practice", Pilots remain "current", what do Certificated FAA technicians do?

We are now entering an era where the Aviation Industry can not get qualified technicians. *Until I came across the terminology "**RII**" in the new NPRM for FAR145, I pretty much accepted it. After talking to Washington and finding out the logic behind it, I do not accept this type of Aviation philosophy. I think the cat was let out of the bag years ago when we first started with RII. Now we are making it an institution.*

I was told the certificate holder is responsible for the "*Inspection System they chose to put in place*". I disagree, when the FAA crosses over **that** line with that attitude; they are no longer protecting the US citizen.

Sincerely


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