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The DOT OIG Report on Safety - The Time for a New Mindset Is Long Overdue

On February 11, the official report on safety at Southwest Airlines from the Department of Transportation (DOT) Office of the Inspector General (OIG) was made public. You can access that report [here](#). In essence, the report cited concerns regarding Southwest's Safety Management System (SMS), lack of compliance with safety regulations, operational issues, maintenance inspections and oversight. Just as important, the FAA Certificate Management Office (CMO) was shown not to be overseeing Southwest in a proper manner.

We all know that "always complying with regulations" or FAA directives does not necessarily, nor unconditionally guarantee, safety in aviation. Aviation is dynamic, and the human interface with such requires Pilots to be the final authority and backstop to manage safety and risk. In order to do so, we not only need experience, skill, tools, and technology; we must also have the avenues to address problems and the support of Southwest and the FAA.

A safe operation is needed and required for any airline, but that is too simplistic. Safety isn't just about being safe today, it is about learning to be safer in the future. It is having the proper mix of flying skills and technological skills.

First, let's discuss some good things that are occurring at Southwest in order to make us safer going forward. Publicity alone from the above-mentioned report, will and should put a renewed scrutiny and emphasis on safety. In addition, we have a new Vice President of Air Operations, Captain Alan Kasher. I trust Alan. In order to succeed, he must be given the authority that he was denied previously as Vice President of Flight Operations to direct the required changes where they need to be made.

The relationship between Southwest and the previous leadership at the Southwest FAA CMO was too cozy at times, as well as conflicted. This was in part due to internal conflict within the CMO itself between management and staff. We now have a new leader at the FAA CMO, Mr. John Caldwell. I along with other SWAPA personnel have met face to face with Mr. Caldwell. I have no doubt that interaction with Southwest will be conducted at arm's length going forward and we are very encouraged.

We also have a very strong relationship with the FAA Administrator's office that was forged because of recent problems with our Aviation Safety Action Program (ASAP). I am happy to report SWAPA recently renewed to stay in this program with the FAA and Southwest. It was, however, a near monumental struggle to get there. When repeated personality issues arose with an Event Review Team (ERT) member from the FAA, the Administrator's office was instrumental in getting things back on track. They have also been very helpful in taking our input and assisting with issues we have had with the return to service (RTS) complexities of the MAX.

One thing Southwest did correctly is embrace and enact Extended Envelope Training (EET) ahead of regulatory requirements. This training is vital to a safe operation; it will and should be an ongoing part of our training curriculum. SWAPA does however have strong disagreement with Training Center leadership, attitudes, and methods. Changes in some key personnel are long overdue. We have a commitment from Captain Kasher and newly appointed Vice President of Flight Ops, Captain Bob Waltz, that these issues will be examined.

The OIG report references our weight and balance issues. SWAPA strongly supports a review of and more intuitive and Pilot friendly approach to what we know as Performance Weight and Balance (PWB). PWB as it exists now and the way we were trained should have never been approved to start with. We should have never been subjected to a majority of our training on PWB by a bulletin of 72 pages and we should have had more hands-on time with this new system in addition to computer-based training we received via our Electronic Flight Bag (EFB). Once again, Southwest tried to "Southwestize" and complicate something that didn't need to be so complicated in order to make it look like something from the past. The reasons: arrogance, ignorance, and greed. Sound familiar?

Having real time data on our EFBs is great in theory, but until such a time exists and we have reliable Wi-Fi on our aircraft, we need printers on all our aircraft to be able to make our operation the safest it can be. PWB can also be enhanced by an improved Takeoff Landing Approach Report (TLAR) with a range of data and parameters to give us more awareness and an ability not to be so heads down and distracted at critical times or with every change in weather.

For those of you who have been through Continuing Qualification Training (CQT) this year or heard about it, it needs some work. The Maneuvers Observation (MO) is too congested and our Line Operation Evaluation (LOEs) have continually added on so many events that they no longer represent realistic line operations. The good news is our complaints have finally started being heard after years of being ignored. We are helping shape the programs for 2021. The Advanced Qualification Program (AQP), of which CQT is a part, is a triad, just like ASAP, between the FAA, SWAPA, and Southwest. We have made that point very clear to the FAA and Southwest. SWAPA will be adamant the AQP advisory circular is followed.

One of the most troubling topics of the report dealt with Southwest's desire to rapidly add foreign acquired airframes to the fleet. These 88 aircraft are referred to as the "Skyline aircraft." In addition to the OIG report, the U.S. Senate Committee on Commerce, Science, and Transportation published a fact sheet regarding these aircraft that can be found [here](#).

In 2017, FAA inspectors began identifying potentially serious gaps in Southwest Airlines' process for verifying the condition of the aircraft, including undocumented major repairs and aircraft records not complying with regulatory standards. This was due to designated airworthiness representatives not following established procedures for ensuring aircraft conformed to U.S. standards.

The FAA says that the process for ensuring that a foreign purchased aircraft conforms to U.S. standards "normally takes 3 to 4 weeks." However, according to Southwest's own airworthiness certificates, 71 of the 88 aircraft were approved **on the same day** as the repair station inspection.

Who were all these "designees" that approved these aircraft for use by Southwest? First and foremost, none of them were our AMFA mechanics. In fact, according to AMFA, Southwest management has cut

AMFA out of this entire process and "they do not see AMFA as a stakeholder in this process." That in and of itself is concerning. Southwest subcontracted inspections and modifications of the Skyline aircraft. The subcontractor chosen was Aviation Technical Services (ATS). Southwest Airlines and ATS have been collaborating on the Skyline project since 2014, and ATS even received an award as the top MRO in 2016 as a direct result of its collaboration with SWA for the Skyline aircraft. That link can be found [here](#).

At the time, Landon Nitschke was the VP of Tech Ops at Southwest Airlines (he now holds the position of Senior VP of Tech Ops). You may recall that name from previous communications, I sent out information about the serious safety culture issues faced by our mechanics under his leadership that have been highlighted by numerous whistleblower complaints. Those complaints, as well as a memo from Southwest maintenance management, can be found below.

- [FAA - Dallas](#)
- [FAA - LAX](#)
- [FAA - LAX 2](#)
- [FAA - LAS](#)
- [FAA - Deviation Notification](#)
- [FAA - Complaint](#)
- [Kochersperger Testimony](#)
- [It's Your Call](#)
- [Fact Sheet: Whistleblower Aviation Industry](#)

There are also several links addressing the now-completed audit that can be found below:

- [Dallas Business Journal: After Passenger Death, Audit Opened into FAA's Oversight of Southwest](#)
- [Skift: Federal Auditor to Investigate FAA's Safety Oversight of Southwest Airlines](#)
- [The Dallas Morning News: FAA Faces Scrutiny Over How it Handled Concerns About Southwest Operations before Flight 1380 Tragedy](#)
- [The Wall Street Journal: DOT Watchdog Examines FAA Oversight of Southwest Airlines](#)

These complaints were brushed under the rug by our COO as mere negotiations ploys rather than actually assessing the content of those complaints. Prior to coming to work for Southwest Airlines in 2012, Landon Nitschke was a Vice President at ATS, the Company that conducted the Skyline program on behalf of Southwest Airlines.

Our mechanics have been caught in this professional purgatory for years now. Mechanics have been told by their supervisors "Dallas is watching us." Another mechanic was told by Southwest management, "If you are worried about your license, write it up. If you are worried about your job, I don't know."

The lack of trust created by Southwest and the FAA resulted in a staggering 21 whistleblower complaints and countless FAA Hotline calls over the course of four years by Southwest mechanics because of a complete and utter failure of the internal safety process. Southwest leadership continued to characterize our mechanics' pleas as nothing more than contract negotiations ploys. The OIG report now lends credence to what our AMFA mechanics have been claiming for many years.

Southwest needs our mechanics just as much as they need us. In order to have any semblance of a viable SMS in Tech Ops, and rebuild trust within the ranks, the lawsuits still outstanding by Southwest against AMFA must be withdrawn immediately. Until this is done, intimidation and harassment of our mechanics will continue and effect the safety culture at this airline.

There also must be a thorough review of maintenance done at foreign repair stations on Southwest aircraft. As of last year, Southwest outsourced over 80 percent of all aircraft maintenance. You read that correctly - 80 cents of every dollar Southwest spends on maintaining and repairing our aircraft is outsourced. The last thing we need is to discover more and potentially even more serious problems where oversight is even more lax, and the ratio of licensed mechanics to non-licensed ones is staggering. Southwest should release data showing the maintenance reliability rates for each vendor compared to the reliability rates of our mechanics. These reliability rates should include how much work was initially done incorrectly, and how much work had to be redone once the aircraft was put back into service. For more information and facts on this topic, please see my [State of Managerial Emergency](#) blast from last February.

The back of the napkin, 1980's mentality at Southwest must stop. This most recent investigation must be one final wake up call to the Southwest Board of Directors and Southwest leaders. What we once thought was unimaginable of our leaders, has now come to fruition. There are disturbing parallels with Boeing's situation; Southwest must learn from Boeing's mistakes or they find themselves in the same situation.

You, the Pilot leaders of our Company, keep our operation safe despite all the swirling issues and problems our own Company sometimes creates. Continue to fly the jet and take care of our passengers and your fellow employees. No matter how uncomfortable, SWAPA will address the above issues head on and we will protect our passengers. They have our word and we have their back.

Leading Forward,

Jon

**Capt. Jon Weeks
President
Southwest Airlines Pilots Association**