UNITED STATES OF AMERICA NATIONAL TRANSPORTATION SAFETY BOARD WASHINGTON, D.C.

#### ABSTRACT OF AVIATION ACCIDENT REPORT ALASKA AIRLINES FLIGHT 261, MD-83, N963AS PACIFIC OCEAN ABOUT 2.7 MILES NORTH OF ANACAPA ISLAND, CALIFORNIA JANUARY 31, 2000 NTSB/AAR-02/01

Board Room and Conference Center National Transportation Safety Board 429 L'Enfant Plaza, SW Washington, D.C.

> Tuesday, December 10, 2002 9:30 a.m.

#### National Transportation Safety Board

CAROL CARMODY, ACTING CHAIRMAN GEORGE W. BLACK, MEMBER JOHN HAMMERSCHMIDT, MEMBER JOHN L. GOGLIA, MEMBER

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PROCEEDINGS 1 2 9:30 a.m. 3 ACTING CHAIRMAN CARMODY: Good morning. Could we take our seats? Let's take our seats and 4 5 close the door in the back, if you will, please. 6 I'm going to go ahead and begin since it is 9:30 and we have a long day in front of us. 7 8 On January 31st, 2000, about 16:21 Pacific 9 Standard Time, Alaska Airlines Flight 261, a McDonnell-10 Douglas MD-83, crashed into the Pacific Ocean about 2.7 11 miles north of Anacapa Island, California. The 12 airplane was completely destroyed. There were no 13 survivors among the five crew and 83 passengers. 14 I'd like to extend a special welcome to the 15 families of the victims who are here with us today as well as to all the other people who have come to 16 17 observe the board meeting. This is a sunshine meeting of the National 18 19 Transportation Safety Board. That essentially means 20 that federal agencies must conduct their business in the open, in the public. Therefore, board meetings are 21 22 called sunshine meetings. While the public is invited 23 today to observe the meeting, only the Board and the staff will be participating in the meeting. 24 25 A few weeks ago, the staff submitted for the

Board's consideration a Draft Accident Report of this accident. We've had several weeks to read it. I think most of us have read it numerous times, and we've had an opportunity to talk with the staff about it, but this is the first time we have met as a board to review and consider the report itself as well as the recommendations and the probable cause.

8 Because this document being considered is a draft, it does not necessarily reflect the views of the 9 10 agency and it's not available to the public at this 11 time. During today's meeting, you will observe the 12 board members going through the draft section-by-13 section eliciting responses, asking questions of the 14 staff. Once they have gone through the body of the 15 Draft Accident Report, the board members will then 16 consider conclusions, probable cause determination, and 17 specific safety recommendations proposed in that 18 report.

19 The board members will determine if they 20 should approve the report, the draft, with editorial, 21 analytical or factual corrections agreed to during the 22 meeting or if it should be returned to the staff for 23 revision. Such deliberations over a draft report can 24 take anywhere from 90 minutes to the better part of a 25 day. Sometimes all or part of a draft conclusion,

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1 probable cause, or recommendation is revised or

2 rejected by the members. That's because you're viewing 3 our actual deliberations, our sunshine meeting.

About 30 minutes after the meeting, copies of abstracts containing the conclusions, probable causes, and recommendations will be available. It can be obtained from the Board's Public Affairs Office which is in Room 6201.

9 In the event of an emergency, such as a fire, 10 the building alarm system will activate and a voice 11 message will instruct persons to vacate the building. 12 You should proceed to your nearest exit. There are 13 emergency exits up front, to the left and right of the 14 podium, and, of course, in the back of the room.

Also for your convenience, the restrooms and telephones are in the foyer in the back on your left as you exit.

18 To provide the appropriate meeting 19 environment, I ask that you put your cell phones, your 20 beepers, your pagers on silent. If you need to make a 21 call, please leave the room to do so.

I'd like to introduce my fellow board members
with me today. On my left, Member John Hammerschmidt.
He was the member on scene for this accident. On my
right, Member John Goglia, and at the end, Member

1 George Black.

2 I will now move to the Managing Director who 3 will introduce the staff. 4 Mr. Campbell? 5 MR. CAMPBELL: Good morning, Madam Chairman, 6 Members of the Board. With me at the front table, to my left, is 7 Ron Battocchi, the agency's General Counsel, and 8 proceeding to my right, John Clark, the Director of the 9 10 Office of Aviation Safety, Richard Rodriguez, the 11 Investigator-in-Charge in this accident, Jeff Guzzetti, 12 who is the Chairman of the Systems Group, and Joseph Kolly, who is the Chairman of the Grease Group. Mr. 13 14 Rodriguez, the Investigator-in-Charge, has the opening 15 statement. 16 Thank you. 17 ACTING CHAIRMAN CARMODY: Please go ahead, Mr. Rodriguez. 18 19 MR. RODRIGUEZ: Good morning, Madam Chairman, 20 Board Members, ladies and gentlemen. 21 My statement and staff presentations this 22 morning summarizes the significant findings of this 23 investigation, including the failure mode of the horizontal stabilizer jackscrew, the relative effects 24 25 of lubrication and inspection of the jackscrew, the

Alaska Airlines Maintenance Program, and the FAA
 oversight of Alaska Airlines.

3 Alaska Airlines Flight 261 departed Puerto Vallarta at 1337. This profile shows various 4 significant points during the flight. The flight 5 6 operated normally until 23,400 feet when the horizontal stabilizer jammed. From this point on, the aircraft 7 8 generally continued climbing in a series of climbs and 9 level-offs until the autopilot disconnected at 28,557 feet and 296 knots. During the next seven minutes, the 10 aircraft began climbing at a much slower rate as the 11 12 pilot was flying manually using up to 50 pounds of pulling force to maintain the climb attitude. 13

By 1400 hours, the aircraft had leveled at the assigned altitude of 31,000 feet, and for the next 24 minutes, the aircraft was flown manually at 280 knots with about 30 pounds of pulling force to maintain level flight. Then the crew accelerated to 301 knots and the pulling force was reduced to about 10 pounds.

About one hour and 15 minutes later, the autopilot was re-engaged and the crew contacted Company Dispatch and Maintenance Control in Seattle to discuss the stabilizer problem. During the next 17 minutes, the crew discussed operational details of diverting into Los Angeles with Dispatch and advised Los Angeles

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1 Operations that they intended to land there.

2 At 16:08, a Los Angeles mechanic asked if the 3 crew had tried the suitcase handles and the pickle switches and the captain responded, "Yeah. We tried 4 5 everything together." One minute later, there was a 6 click recorded on the CVR as the captain stated, "This'll click it off." During the next two seconds, 7 the CVR recorded a clunk, the sound of two faint 8 9 thumps, and a sound similar to the horizontal 10 stabilizer in motion audible tone.

11 Following the autopilot disengagement, the 12 horizontal stabilizer moved from the jammed position to full nose down and the aircraft pitched to nearly eight 13 14 degrees nose down attitude. In the dive that lasted 15 about 80 seconds, the air speed increased rapidly to 16 353 knots which is 10 knots above the maximum allowable 17 air speed, and the aircraft descended to between 23,000 and 24,000 feet. Calculations indicate that a column 18 19 force of a 130 to 140 pounds was required to recover 20 from the dive.

At 16:11, the captain advised the controller, We are at 24,000 feet, kind of stabilized." For the next several minutes, the crew discussed their problem with Los Angeles Maintenance, the cabin crew, and also advised the passengers that they had a control problem

and would be diverting into Los Angeles. During this time, the controller cleared Flight 261 to descend to 17,000 feet and assigned them a heading of 280 degrees to remain out over the water.

5 As the aircraft was leveling off at 6 approximately 18,000 feet, the air speed had decreased 7 to 253 knots and the captain asked for slats extend and then shortly requested flaps 11 degrees. Once 8 configured, the captain commented, "Actually, it's 9 10 pretty stable right here, but we got to get down to a 11 180." The captain ordered retraction of the flaps and slats and the air speed again began to increase from 12 245 to 270 knots. 13

14 At 16:19:21, the cockpit voice recorder 15 recorded the sound of faint thumps and the horizontal stabilizer moved for the second time since the initial 16 17 jam during the climb-out. The captain asked if the 18 first officer had felt the thump and he replied, 19 "Yeah." The captain then expressed increased 20 difficulty controlling the aircraft and asked for the 21 slats and flaps to be extended again. At this time, 22 the aircraft was at 17,900 feet. The air speed had 23 increased to 270 knots and the nose attitude was plus 24 two degrees.

25 At 16:19:36.6, an extremely loud noise was

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recorded. Within the next few seconds, the vertical acceleration changed to -3 Gs. The aircraft pitched down at a rate of 25 degrees per second and began rolling to the left. The aircraft continued descending in the relatively uncontrolled inverted attitude to water impact.

At this time, I would like to show a brief animation of the aircraft final maneuver. As a courtesy to family members who may not wish to see the animation, I will pause briefly for them to be excused before beginning. The animation begins approximately 25 seconds before the final dive.

13 (Pause)

MR. CAMPBELL: At the beginning of the animation, the crew is commenting on controllability and discussing damage. Then there are the faint thumps and the call for the slats and flaps and then the loud noise and the loss of control.

In order to more fully understand the conditions that the crew of this flight faced, we have prepared two additional presentations, the first begin Mr. Jeff Guzzetti, the Systems Group Chairman, who will describe the operation of the horizontal stabilizer jackscrew assembly and the failure sequence.

25 MR. GUZZETTI: Good morning, Madam Chairman

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1 and Members of the Board.

The MD-80 is a twin-engine transport category airplane which the FAA certified in August 1980. The MD-80 was derived from earlier DC-9 series model airplanes and as a result much of the MD-80's structure, systems, components and installations are similar to the DC-9 which entered service back in December 1965.

9 Longitudinal trim control for the MD-80 is 10 provided by the horizontal stabilizer. The tail 11 surface is a critical flight control not only because 12 it provides a constant aerodynamic balancing force that allows the airplane to maintain controlled flight but 13 14 also because the movement of the stabilizer can be 15 commanded to aid in controlling the airplane's pitch or 16 up and down movement.

17 Staff has prepared a six-minute animation to 18 show how the horizontal stabilizer operates and also to 19 show the sequence of failures that occurred during the 20 accident flight. So, if we can cue up that animation now, I'll narrate it, and while we're waiting, I'd like 21 22 to thank Kevin Renze and Doug Brazy for producing this. 23 The horizontal stabilizer is mounted on top of the 18-foot high vertical stabilizer in a T-tail 24 25 configuration. The horizontal stabilizer has a span of

about 40 feet and compromises a center box and a left 1 and right outboard section. In this animation, only 2 3 the left outboard section is shown. The leading edge 4 of the horizontal stabilizer can be raised or lowered 5 as the entire surface pivots about its hinge points. 6 The stabilizer's normal limit of motion upward is 2.1 7 degrees. This upward motion tends to pitch the 8 airplane's nose down abbreviated by the letters AND. 9 The normal limit of motion downward is 12.2 degrees 10 which tends to pitch the airplane's nose up or ANU.

11 Here you see the stabilizer move throughout 12 its full range of motion before returning back to its 13 neutral or zero degree position. For the purposes of 14 this presentation, the speed of the stabilizer shown 15 here is twice that of actual operation. The horizontal 16 stabilizer is connected to the vertical stabilizer by 17 hinges at its aft spar and with a single jackscrew 18 actuator assembly at its front spar near its leading 19 edge.

The animation will now provide a cut-away view of the tail assembly so that you can view the actuating mechanism for the horizontal stabilizer. As the view shifts, let me take this time to inform you that movement of the stabilizer can be commanded either automatically by the autopilot or manually by the

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flight crew. Any of these commands activates either the primary or alternate trim motor shown here in purple. The motors are connected to a gear box shown in black which is needed to rotate the acme screw shown in blue by applying a torque to a titanium torque tube that is held fixed inside the screw.

The upper end of the jackscrew assembly is 7 attached to the horizontal stabilizer and the lower end 8 is threaded through the acme nut shown in yellow which 9 10 is attached to the vertical stabilizer. The jackscrew 11 assembly also has upper and lower mechanical stops 12 shown here in green attached to the screw to stop screw rotation in case of a malfunction of the normal 13 14 electrical shut-off controls. The entire jackscrew 15 assembly is covered by a tip fairing on top of the 16 vertical stabilizer. This fairing is attached with 17 brackets that I will mention later in this 18 presentation.

As the animation shows the stabilizer moving toward its upper and lower limits of travel, you'll notice that the rotation of the screw through the nonmoving nut causes the screw to translate upward and downward. This rotation between the case-hardened steel screw and the softer aluminum bronze nut gradually wears down the thickness of the nut threads.

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1 It is important to note here that the acme nut is by 2 design the wearing component in this system. 3 Therefore, frequent lubrication is needed to minimize 4 the rate of nut thread wear in order to maintain the 5 expected wear rate of about 1,000ths of an inch per 6 thousand flight hours.

Additionally, a periodic inspection procedure to monitor this wear is also required. This inspection is known as the end-play check, and if the wear exceeds 40,000ths of an inch, then the jackscrew assembly is to be replaced. These maintenance and inspection requirements will be discussed in detail later in this meeting.

14 The animation will now depict the system 15 operation and sequence of failures that occurred during 16 the accident flight. Flight data recorder information 17 indicated that the accident airplane's longitudinal 18 trim control system was functioning normally during the 19 airplane's descent and landing into Puerto Vallarta on 20 the flight just before the accident flight. Later, 21 while preparing for take-off from Puerto Vallarta, the 22 accident flight crew had trimmed the airplane to a 23 seven-degree airplane nose-up position as you see here. 24 As the airplane was climbing out after take-25 off, the horizontal stabilizer moved at the normal

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primary trim motor rate of one-third of a degree per 1 2 second from seven degrees to two degrees airplane nose 3 Thereafter, as the airplane continued to climb up. through 6,200 feet, the stabilizer moved at the normal 4 5 alternate trim motor rate of one-tenth of a degree per 6 second from two degrees airplane nose up to 0.4 degrees 7 airplane nose down. Operation of the alternate trim motor during this period is consistent with use of the 8 9 autopilot. Again, for the purposes of this 10 presentation, the alternate trim motor speed of the 11 stabilizer shown here is twice that of actual 12 operation.

As the airplane continued to climb through about 23,000 feet, the stabilizer stopped moving at the 0.4 degree position. This cessation of stabilizer movement is consistent with the mechanical jam. Evidence suggests that this jam occurred due to the deteriorated condition of the acme nut threads that resulted from a lack of lubrication.

Two hours and 20 minutes after this jam occurred, immediately after the autopilot was disconnected by the flight crew with the activation of the primary trim, the stabilizer traveled from its jammed position to about the 3.1 degree airplane nose down position. Aircraft perform and kinematic analyses

indicate that the severely-worn threads of the acme nut 1 stripped out at this point, allowing the acme screw to 2 3 be pulled upward through the nut until the lower 4 surface of the acme nut contacted the lower mechanical 5 stop on the acme screw. The airplane entered the 6 initial dive as the stabilizer moved. The lower 7 mechanical stop and the torque tube that was connected 8 to it was not designed to withstand the aerodynamic 9 loads produced by the horizontal stabilizer.

10 About eight minutes later, after the airplane 11 had recovered from the first dive, the torque tube and 12 lower mechanical stop separated. The horizontal 13 stabilizer moved upward from the 3.1 airplane nose down 14 position to about a 3.6 airplane nose down position 15 where it contacted the fairing brackets that were attached to the structure of the vertical stabilizer. 16 17 These brackets were never designed to carry the tail loads. Several seconds after the horizontal stabilizer 18 19 contacted the fairing brackets, the brackets failed, 20 releasing the horizontal stabilizer. The resulting 21 upward movement of the horizontal stabilizer's leading 22 edge caused an uncontrollable downward pitching of the 23 airplane from which recovery was not possible.

And that concludes my presentation.

25 ACTING CHAIRMAN CARMODY: Thank you, Mr.

1 Guzzetti.

2 MR. RODRIGUEZ: Our second presentation is by 3 Mr. Joe Epperson, the Materials Group Chairman, who 4 will describe recovery of the horizontal stabilizer 5 jackscrew assembly and how it failed.

6 MR. EPPERSON: Good morning, ladies and 7 gentlemen.

8 This morning, I will be giving you a brief 9 description of some of the significant findings with 10 respect to the metallurgical and mechanical behavior of 11 the horizontal trim system.

12 As shown here, the jackscrew assembly was 13 recovered from the ocean with the acme nut separated 14 from the acme screw. At this point, the assembly had 15 only received fresh water rinses and was still attached to the horizontal stabilizer. Acme nut thread remnants 16 17 were found entwined around the center portion of the acme screw. This photograph shows a closer view of the 18 19 acme nut thread remnants wrapped around the center 20 portion of the acme screw in their recovered condition. 21 When examined shortly after recovery, no 22 grease or lubricant was detected in the working area of 23 the screw. Grease covered by sand from the ocean bottom was found on the lower end of the screw and an 24 25 oily sheen was present on the upper end. Grease was

also found on the lower mechanical stop which had
 separated after the torque tube fractured at its lower
 end. The acme screw showed relatively minor wear and
 no evidence of abrasive wear.

5 The separated lower mechanical stop was 6 recovered from within the vertical stabilizer structure and was partially covered by grease. The upper surface 7 8 shown here after cleaning was damaged in several 9 locations by contact with the lower end of the acme 10 These marks could have only been made after nut. 11 complete separation of the nut threads and the contact 12 would induce offset loading and bending in the torque 13 tube. Additional damage to the stop indicates that the 14 screw rotated after the lower stop contacted the nut.

15 The acme nut was recovered separated from the 16 jackscrew assembly but still attached in its original 17 position in the vertical stabilizer. The threads on 18 the interior of the nut were completely stripped and no 19 grease was present inside the bore. However, red and 20 green grease was found in various areas on the exterior 21 of the nut and on surrounding structure. Additionally, 22 the grease fitting passageway of the nut was found 23 blocked by degraded grease containing wear particles and flakes from the acme nut. 24

25 This slide illustrates and compares the

internal threaded area of the accident nut on the right to that of a worn nut removed from service on the left. The sections -- the nut has been sectioned longitudinally here. Significant thread material remained in the used nut while on the accident nut none remained.

7 When the jam between the acme screw and the acme nut released at the beginning of the initial dive, 8 the acme screw pulled upward through the acme nut until 9 10 it contacted the lower mechanical stop, creating the 11 previously-mentioned offset loading. The torque tube 12 subsequently fractured at its lower end as a result of 13 low-cycle fatigue due to the continued flight loads. 14 The fracture was not characteristic of a single event.

The dash line in the inserted image here depicts the extent of fatigue on a portion of the crack. Mechanical tests established that similar fractures could be produced in as few as 100 cycles by applications of very high cyclic stresses, similar to those experienced by the accident components.

In order to address issues related to thread wear and failure mechanism and to the load environment in which the grease operated, the Safety Board and Boeing initiated finite element studies to analyze the stress and deformation in the jackscrew under

operational loads. Two actual models containing all 32 threads in the acme nut were analyzed to investigate load transfer between the screw and the nut and local 3-dimensional analyses were performed to study the contact pressure, nut thread deformation, and the influence of nut thread wear.

Analvsis of these models showed that the 7 actual stress distribution within the nut was non-8 uniform and that in certain conditions, as few as four 9 10 threads could be carrying as much as 90 percent of the 11 load. As wear progressed on more highly-loaded 12 threads, the loads would shift or move to less-worn threads. The results also highlighted that the local 13 14 contact stresses and distribution did not change as the 15 wear progressed to well beyond the operational wear limits on the acme nut thread. 16

17 The contact pressures for an extreme load 18 condition of 8,000 pounds averaged 3 to 4,000 pounds 19 per square inch over the contact area. At extreme wear 20 levels, the non-uniform load transfer caused bending 21 deformation under normal flight loads, consistent with 22 the unique shape of the remnants. The non-uniform 23 loading of the threads is also consistent with the 24 incremental shearing of the threads and production of 25 the thread remnants.

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1 Fractured remnants comprising approximately 75 percent of the acme nut threads were recovered from 2 3 the working area of the screw. This view shows the end 4 of one of these remnants. The remnants were sheared at 5 the thread route and were less than 10 percent of their 6 original thickness. They had multiple wear surfaces indicating multiple stages of wear and deformation 7 8 resulting in the unique shape.

9 This slide illustrates the wear and 10 deformation sequence as indicated by the shape of the 11 remnants themselves. The first position shows a new 12 condition with the remnant shape imposed upon a new 13 thread. Wear would be expected to progress with a 14 normal geometry up to Position 2. This corresponds to 15 an approximately end play of 82,000ths of an inch.

As was just discussed, the finite element 16 17 analyses indicated that beyond this level of wear, the 18 thread would begin to experience large degrees of 19 bending deformation. Position 3 shows the relative 20 positions of the nut and screw after some deformation and additional wear. Position 4 shows the deformed and 21 22 non-uniformly-worn thread remnants just before fracture 23 and separation from the nut.

In conclusion, these are some of the findings
that arose from the metallurgical investigation of the

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jackscrew assembly and the overall investigation.
 There were no material defects or conditions that
 contributed to the wear nor were there any structural

4 conditions, such as wobbling of the jackscrew, that5 would contribute to the wear.

6 Upon the recovery from the ocean, there was 7 no lubrication in the working area of the acme screw. Furthermore, based on the presence of grease elsewhere 8 on the recovered structure, the absence of lubrication 9 10 on the screw cannot be explained by impact with the 11 ocean, by exposure to seawater before recovery, or by 12 the recovery and cleaning operations. Also, the lack of abrasive wear to the threads of the acme screw 13 14 indicated that the jackscrew assembly grease had not 15 been contaminated with abrasive particles.

16 The finite element analyses showed that local 17 contact stresses and their distribution between the 18 screw and the nut did not change as wear progressed 19 beyond the operational limits of the acme nut. The 20 wear was caused by sliding contact consistent with an 21 unlubricated condition. The low-cycle fatigue crack in 22 the torque tube was generated during the accident 23 flight by unusual loading after complete loss of the 24 acme nut threads.

25 This completes my presentation on

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1 metallurgical findings.

2 Thank you.

3 MR. RODRIGUEZ: Our examination of the failed threads of the acme nut led to an immediate effort to 4 5 ensure that there were no other jackscrews in the fleet 6 that were about to fail. On February 9th, the day 7 after the jackscrew was recovered, Alaska Airlines Maintenance Department and Boeing independently took 8 steps to inspect all DC-9, MD-80, MD-90, and B-717 9 10 aircraft and to report findings of various inspection 11 conditions of the jackscrew assembly. These 12 inspections formed the basis for Airworthiness Directive AD-2000-0351, issued on February 11th, by the 13 14 FAA.

During the initial fleet survey required by the AD, two additional MD-80s in the Alaska Airlines fleet, November 981 Alpha Sierra and November 982 Alpha sierra, were found to have jackscrews worn beyond limits. The wear rate on these two aircraft was over four times the wear rate anticipated by the manufacturer.

With three deficient jackscrews out of a fleet of only 34 aircraft, the investigation focused on possible unique differences in the Alaska Airlines operation of the MD-80s and that of other much larger

fleets in the industry. One factor was that Alaska 1 2 Airlines was the only operator using Aeroshell 33 for 3 lubrication. In order to assess the possible involvement of Aeroshell 33 on the wear characteristics 4 5 of the Alaska Airlines fleet, we formed a Grease Group to study the relative characteristics of Aeroshell 33 6 and Mobilgrease 28 and the effectiveness of each as a 7 8 lubricant.

9 Dr. Joseph Kolly was the chairman of this 10 group, and he will now give an overview of the group's 11 activities and findings.

MR. KOLLY: Good morning, Madam Chairman andMembers of the Board.

14 This morning, I would like to present the results of the testing that was conducted as part of 15 16 this investigation into lubricating greases. As you 17 just heard from Mr. Epperson, the recovered jackscrew 18 was lacking grease and did not exhibit any material or 19 fabrication defects. These factors suggest that 20 lubrication effects played a key role in the excessive 21 wear of the acme nut threads.

To further evaluate what role lubrication played in the accelerated wear, the investigation focused on the two brands of grease that were in use for jackscrew lubrication at Alaska Airlines,

Mobilgrease 28 and Aeroshell 33. Until 1997, Alaska Airlines used Mobilgrease 28. Mobilgrease 28 had a long history of satisfactory performance at Alaska Airlines. In fact, a majority of other carriers also used Mobilgrease 28 for jackscrew assembly lubrication and they have also experienced satisfactory performance.

8 Beginning in 1997 and up to the time of the 9 accident, Alaska Airlines specified the use of 10 Aeroshell 33 for lubrication of the jackscrew assembly 11 components, although Mobilgrease 28 was apparently 12 still also used.

The picture on the left shows a magnified 13 14 view of a small amount of residual grease taken from 15 the accident jackscrew assembly. Only a small amount 16 was recovered from the screw and only from the 17 locations outside the normal operating regions of the 18 Its appearance indicates it is highly degraded. screw. 19 It no longer has the semi-fluid character of fresh 20 grease, like that exhibited by the sample of new unused 21 grease shown on the right.

22 Because of the limited amount of grease 23 recovered and its highly-degraded condition, a perfect 24 chemical identification of the grease was not possible. 25 However, analysis of the residue was consistent with

the presence of both Aeroshell 33 and Mobilgrease 28. 1 2 These images are of higher magnifications of 3 the degraded grease sample just shown. The image on the left shows the presence of a high concentration of 4 5 metallic particles. The image on the right shows a 6 magnified view of these particles. These particles are 7 aluminum bronze wear particles that were shed from the 8 acme nut as a result of sliding wear. Particles 9 generated by sliding wear are easily identified by 10 their flat flake-like shape. Sliding wear is the type 11 of wear that is expected in jackscrew operation. These 12 particles do not indicate that other wear conditions were present. There is no evidence that wear was 13 14 caused by corrosion or wear caused by abrasive foreign 15 materials.

16 One of the primary questions that our testing 17 was designed to address was whether Alaska Airlines 18 switch to Aeroshell 33 could have resulted in poor 19 lubricating performance and contributed to the 20 accelerated wear of the acme nut threads that led to 21 the accident. Therefore, we developed a test program 22 to determine the relative performance of Aeroshell 33 compared to that of Mobilgrease 28 under simulated 23 conditions of jackscrew operations. 24

25 A test program was developed with three basic **EXECUTIVE COURT REPORTERS, INC.** 

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parts consisting of grease testing, exposure testing, 1 and wear testing. I will briefly describe the 2 3 activities and results in each of these areas. Testing of the physical properties of Aeroshell 33 and 4 5 Mobilgrease 28 was accomplished by the U.S. Navy 6 Aerospace Materials Laboratory. The naval laboratory is the steward of the military specification or Mil 7 Spec of both of these types of greases and has 8 9 extensive experience in grease testing and interpreting 10 their results.

11 Standardized grease tests were conducted on 12 both Aeroshell 33 and Mobilgrease 28 and of many different mixture ratios of these two greases. These 13 14 are the types of tests that are used to qualify greases 15 under military specifications. The tests showed that 16 the greases and their mixtures largely behaved in a normal or expected fashion. In a few instances of 17 18 mixing, excursions from normal were marginal and 19 considered to have an insignificant effect on 20 performance. As a result, the investigation found that 21 mixing of Aeroshell 33 and Mobilgrease 28, as for 22 example would be caused by alternating use of these 23 greases during maintenance, would not have significantly deteriorated the properties of either of 24 25 the two greases.

1 Early in the investigation, there were questions raised regarding the possibility of 2 3 corrosion. Therefore, a comprehensive set of exposure tests were performed to observe the effects of grease 4 5 on aluminum bronze test specimens when exposed to 6 simulated aircraft operating conditions. For this work, we contracted with the U.S. Navy Aerospace 7 Materials Laboratory to conduct the exposure 8 9 experiments. The subsequent chemical analysis was 10 conducted by Science Applications International. 11 In these tests, a variety of conditions were 12 examined. These include the effects of grease mixing and possible in-service contamination due to the 13 14 aircraft's operating environment. Further, 15 temperatures and durations of exposure were varied to 16 represent extremes in the operating environment. 17 A sample test specimen from these tests is shown on the slide. Under certain conditions, 18 19 Aeroshell 33 deposited a small localized discoloration on the surface of the test specimen. An example of 20 21 this discoloration is shown in the slide just above the 22 yellow arrow. The discoloration appears as a vertical 23 stripe about one millimeter in width and occurred at 24 the interface where the area of grease, the area

covered with grease met an area that was not covered

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1 with grease.

A chemical analysis of this area showed that it was not a corrosion product. Rather, it was a deposit caused by the reaction of anti-wear additives in the Aeroshell 33 grease. The presence of such deposits is not considered detrimental to the aluminum bronze.

8 The most significant element of this 9 investigation's test program was the wear testing 10 conducted jointly by Rensselaer Polytechnic Institute 11 and Battelle Memorial Institute. These tests were 12 designed to evaluate the effects that various factors 13 of in-service operation have on the wear rate of 14 aluminum bronze.

15 Before I describe the test results, I would 16 like to briefly discuss the test method we selected for 17 these tests. We chose a standard wear test method 18 called the Block-on-Ring method. This test ring is shown on the slide before you now. The method employs 19 20 a small stationary block that is forced against a 21 rotating ring. These components are lubricated with 22 grease where they come into contact. At this contact, 23 the ring slowly wears a divot into the surface of the 24 block. By carefully measuring the wear of the block 25 during the test, we can very accurately determine the

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1 wear rate caused by each type of grease.

2 The important features of actual jackscrew 3 operation were captured by the Block-on-Ring test method. First, the materials used were the same as in-4 5 service jackscrew assembly materials. Test specimens 6 were manufactured from actual jackscrew components with 7 a block milled from a scrap acme nut and a ring turned from an acme screw forging. Second, the test pressures 8 9 spanned nearly the entire range of pressures 10 experienced between the threads of a jackscrew during 11 aircraft operation. Third, the speeds at which the 12 blocks-on-ring slide relative to each other are very 13 close to that of the in-service jackscrew. Fourth, the 14 type of motion used in the test is a reciprocating 15 sliding motion which closely replicates the intermittent and reversing motion of the jackscrew. 16 17 And finally, the geometry of the contact between the 18 block-on-ring is over a discreet area, similar to the 19 contact geometry of the jackscrew's mating screw 20 threads.

Therefore, the block-on-ring test method was determined to be the best method to simulate the wear behavior of an actual jackscrew assembly under various lubricating conditions.

25 The tests were conducted for a variety of

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1 conditions that were designed to replicate actual in2 service conditions, such as various average pressures,
3 grease mixtures, contaminants, grease aging, and sub4 freezing conditions. A total of 49 tests were run
5 using the block-on-ring test method.

6 The results shown here are from an extensive 7 set of tests conducted at high average pressure loads. 8 The data are shown as colored bars with green representing tests using Aeroshell 33 grease, red 9 10 representing Mobilgrease 28, and blue representing a 11 50-50 mixture of the two greases. The scale on the 12 left indicates the wear rate of aluminum bronze experienced during the test. The height of each bar 13 14 represents the wear rate produced by that particular 15 grease.

16 The first series of tests shown before you 17 was conducted on the grease in its new out-of-the-18 container condition. These tests showed that Aeroshell 19 33 had the lowest wear rate. The highest wear rate was 20 achieved using Mobilgrease 28 and the test using a 21 mixture fell in between these values.

We know that the exact wear rate experienced by the accident airplane since the last end-play check cannot be determined. However, the condition of the recovered acme nut remnants indicates the wear rate was

severe. Based on this information, we can arrive at a conservative estimation of a minimum wear rate for the accident aircraft. This minimum value is shown on the graph as a horizontal purple line.

5 Because these tests replicate the wear 6 behavior of an actual jackscrew assembly in service, we 7 can compare the wear rates of these tests to that of 8 the minimum value estimated for the accident aircraft. 9 These data demonstrate that the use of Aeroshell 33 or 10 a mixture containing Aeroshell 33 cannot account for 11 the severe wear experienced by the accident aircraft.

12 The next set of tests examined the effect of 13 fluid contamination of the grease. Water was added to 14 the grease representing condensate generated during 15 flight. As you can see, the addition of water had 16 little effect on wear rate. We also tested Aeroshell 17 33 contaminated with salt water representing conditions 18 of a coastal environment and de-icing fluid 19 representing inadvertent exposure during de-icing 20 procedures. Neither of these conditions significantly 21 altered the wear rate of test specimens lubricated with 2.2 Aeroshell 33 and continued to exhibit wear rates below 23 those lubricated with pure Mobilgrease 28. As you can see, none of these contamination conditions could 24 25 account for the severe wear rate experienced by the

1 accident aircraft.

Another test examined Aeroshell 33 after it had been used in the previous tests. This used grease contained significant amounts of wear debris which was allowed to age for several months before being retested. The results show no significant effect on wear rate.

8 Another series of tests examined the grease's performance at subfreezing temperatures. The tests 9 10 were conducted in an environmental chamber at 11 temperatures of -20 degrees Fahrenheit to simulate 12 flight temperatures. Subfreezing temperatures also had 13 little effect on the wear performance of either grease. 14 At this point, we can see there is no indication that 15 the use of Aeroshell 33 produces a higher wear rate 16 than Mobilgrease 28. Additionally, there is no 17 indication that any of these conditions could have 18 resulted in the severe wear experienced by the accident 19 aircraft.

The last condition shown here is one in which the test was run without any lubrication. The results of this test are shown as the gray bar. This produced wear rates on the order of 10 times that of Mobilgrease 28. The dramatic difference in wear rate is easily identifiable. Thus, the unlubricated condition is the

only condition that was found that could explain the
 severe wear rate of the accident aircraft. We have
 uncovered no other explanation for that severe wear.

We examined the role of lubrication from a number of angles. In the end, there was no evidence that the use of Aeroshell 33 would have caused the severe and accelerated wear experienced by the accident aircraft's jackscrew. The only factor found to explain this level of severe wear is a lack of lubrication.

10 This concludes my presentation.

11 MR. RODRIGUEZ: Madam Chairman, at this time, before we proceed to other presentations on other 12 13 issues, we're prepared to answer questions on the 14 jackscrew failure sequence or grease and wear testing. 15 ACTING CHAIRMAN CARMODY: Thank you, Mr. 16 Rodriguez. Thank you, Mr. Kolly, for your presentation. They've all been excellent this morning. 17 18 Member Hammerschmidt, any questions on this 19 section? 20 MEMBER HAMMERSCHMIDT: No questions at this 21 I would like to commend the staff for those time.

21 time. I would like to commend the staff for thos
22 outstanding presentations.

ACTING CHAIRMAN CARMODY: Member Goglia?
MEMBER GOGLIA: Yes, Madam Chairman.
Mr. Kolly, we have seen in the press a number

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of concerns raised by folks involved with this accident, parties to this investigation, about the loads that were used by the NTSB in determining the wear rates.

5 I wonder if you would explain to everybody 6 why we chose the loads that we did and the effects of 7 those loads on the testing.

8 MR. KOLLY: First, it starts with a 9 calculation of the aerodynamic loads imparted to the 10 jackscrew that were conducted by our Performance Group 11 through aircraft simulation.

12 Those loads were then transferred to a finite 13 element analysis which showed a non-uniform 14 distribution of loading across the screw threads. We 15 used that average pressure across the screw thread flanks to conduct the majority of our wear tests. 16 We 17 also spanned -- we were also very conservative in that 18 we spanned a pressure range much lower and much higher, 19 covering basically every pressure range that could be 20 conceived in the jackscrew mating threads.

21 MEMBER GOGLIA: Now, you mentioned that the 22 loads vary over the screw, the length of the nut and 23 screw contact. Would you expand that explanation just 24 a little bit? How can that happen if it's precisely 25 machined?

MR. KOLLY: It has to do with the way the loads are transferred through a material and the amount of elastic deformation that a mating thread goes through, that the threads closest to the applied load share more of the load, and then as you go away from the applied load through the series of threads, the load diminishes.

8 MEMBER GOGLIA: And what effect does that 9 have on wear of the threads? In this case, the nut 10 because it's the sacrificial piece.

MR. KOLLY: Wear is proportional to pressure, and so the threads with the highest pressure would tend to wear and then the pressure loads would tend to even out and start to become more and more involved with the wear of the other threads and it would progress towards a more uniform pressure distribution and a more uniform wear distribution.

18 MEMBER GOGLIA: So, you're saying in time, 19 over time, the load, although in the beginning it may 20 be carried by a few threads on either end closest to 21 the load, over time, it gets spread over the entire 22 nut?

23 MR. KOLLY: Yes. An average over the life of 24 the screw is that all the threads eventually obtain the 25 same wear.

MEMBER GOGLIA: Okay. Thank you. I have no
 further questions on this area.
 ACTING CHAIRMAN CARMODY: Member Black?
 MEMBER BLACK: Just a couple.

5 I guess we'll start in order. Mr. Epperson, 6 could you talk a little bit about how the grease gets 7 on to -- gets from the application point into the nut 8 and what you found when you examined that passageway on 9 the accident nut assembly?

10 MR. EPPERSON: Yes. One of the means of 11 application of grease is through a grease fitting on 12 the nut. It's referred to -- commonly referred to as 13 the "zerk" fitting. You see it in every-day

14 applications everywhere.

15 The zerk fitting is a one-way check valve on 16 the outside of the nut. It's actually located on the 17 upper forward surface of the nut, but then it's 18 connected to the interior of the nut, the thread area, 19 by a drilled passageway. This passageway also has a 20 large counterbore so that it supplies grease to both 21 thread paths.

22 On the accident aircraft, as it was 23 recovered, this counterbore and part of the passageway 24 were blocked with a hard crumbly degraded grease 25 containing wear particles. We had to physically remove

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1 this to get the passageway opened.

MEMBER BLACK: What did you find in the 2 3 channel? This assembly was supposed to have been 4 lubricated a couple of months before the accident, is 5 that correct? MR. EPPERSON: That is correct. We found 6 7 some remnants of red grease that was very similar to Mobil 28 inside the grease fitting and around the 8 9 grease fitting. 10 MEMBER BLACK: But if this were blocked, it 11 would be difficult for the grease to get inside the nut 12 which is part of the lubrication process? 13 MR. EPPERSON: We didn't fully test whether 14 the blockage that was there would impede grease flow, 15 how much it would impede grease flow. It certainly would to some extent. Whether it would totally stop 16 17 grease, we didn't investigate that for some 18 investigative reasons. We decided to take the blockage 19 out before we passed additional grease through it which 20 would have contaminated what we had there. So, we had 21 to make a choice there. The blockage certainly would 22 have impeded grease flow. How much is a question. 23 MEMBER BLACK: Did the blockage appear to be 24 of some age or could you tell?

25 MR. EPPERSON: Difficult to say at what age.

## EXECUTIVE COURT REPORTERS, INC. (301) 565-0064

It was definitely severely degraded. It had no 1 2 grease-like appearance at all. It was more like 3 charcoal, if you will. 4 MEMBER BLACK: Okay. We don't have a slide 5 of that? 6 MR. EPPERSON: Figure 17. It's in the 7 report. 8 MEMBER BLACK: Actually, I have one, if worst 9 comes to worse. 10 MR. EPPERSON: That's following Page 125 in 11 the report, Figure 17. 12 MEMBER BLACK: There you go. 13 MR. EPPERSON: Yes. This is my poor drawing 14 illustrating the arrangement of materials. The threads 15 are on the right side. I put threads in this case just to show that that's where they were supposed to be. In 16 17 the accident, there weren't any obviously. The blockage there extends into the -- from the counterbore 18 19 and back into the smaller diameter passageway. 20 MEMBER BLACK: Do you have Exhibit 50 that 21 shows the material once you got it out? 22 MR. EPPERSON: It's not part of the report, 23 but we can --24 MEMBER BLACK: Okay. That's all right if you 25 don't have it. But it was a dry material, --

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1 MR. EPPERSON: It was --

2 MEMBER BLACK: -- clumps of dry material. 3 MR. EPPERSON: -- very dry. It basically resembled crumbled-up charcoal. 4 5 MEMBER BLACK: Okay. 6 MR. EPPERSON: If you can imagine how that 7 has a dry crumbly consistency, and it was embedded with 8 -- heavily embedded with wear particles. 9 MEMBER BLACK: Wear particles. Second 10 question for you. You mentioned that it took about a 11 hundred cycles on the torque tube to produce the low-12 cycle failure. You think, are a hundred loadings and 13 unloadings off axis? 14 MR. EPPERSON: In our mechanical tests that 15 we performed to reproduce the fractured surface, we could get it -- this was on a subsize specimen. So, it 16 17 was not an exact replication of the torque tube. At very high cyclic loads, very high uniform cyclic loads, 18 19 we could get it to fracture in a hundred cycles. 20 Looking at the loading that was on the acme 21 -- on the jackscrew assembly following the first dive, 22 it's very much non-uniform. It's typically referred to 23 as spectrum loading. 24 MEMBER BLACK: Perhaps Mr. Bower has a 25 diagram of that he might be going to produce later or

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-- what I'm -- I'm afraid some people in the audience 1 will confuse cycles of loading with cycles on the 2 3 airplane. In other words, a take-off and landing, and 4 the graph of the variances in the load after the first 5 event might show how that could have accumulated between the time of the first event and the final 6 7 failure of the torque tube. 8 DR. BOWER: Stand by, Member Black. We have 9 one of my charts coming up. 10 MEMBER BLACK: Well, if you're going to do it 11 later, Dan, you can explain it then. 12 DR. BOWER: Except I don't have a planned 13 presentation. 14 MEMBER BLACK: Okay. 15 DR. BOWER: To, this should come up in a 16 second. 17 MEMBER BLACK: Thank you. 18 DR. BOWER: It should be the eighth slide in 19 my presentation. What this slide will show is the 20 calculated tensile load on the jackscrew assembly that 21 we calculated here at the Safety Board in the 22 Performance Group and also a comparison with calculations provided by Boeing. 23 24 MEMBER BLACK: Perhaps next time, I should qive you a list, John. 25

DR. BOWER: There we go. There, we have it now.

3 MEMBER BLACK: So, what we're seeing is the 4 load on the left side and the first event is that peak 5 on the left side?

6 DR. BOWER: Yes. This starts -- this time of 7 this graph starts about the time right at the first 8 initial dive, and we see the load is the calculated, the dark blue line here, and also for comparison, the 9 10 dots are the numbers provided by Boeing for the same 11 time period, and we start out on the left-hand side 12 with the -- right at the initial dive and during the 13 time when we are going through the dive and reach about 14 the maximum overspeed portion is when we have our 15 maximum load, 24,000 pounds, and that's the tensile 16 load on that jackscrew assembly, again all developed 17 the aerodynamic loads on the stabilizer. And after 18 that, we have through the rest of them, the next eight-19 nine minutes, just a very cyclic loading approximately 20 between 13 to 15,000 pounds, up until the final 21 failure.

22 MEMBER BLACK: And of course, the airplane is 23 changing speed during this time period and attitude, 24 pitch angle and that, and the earnest efforts of the 25 pilots to try to recover, so you can easily see in all

of those wigglings there that this -- each of this --1 these would have been loading that torque tube right at 2 3 the very bottom, Joe, and that's where --4 DR. BOWER: Correct. 5 MEMBER BLACK: -- the cycles come from. 6 DR. BOWER: On the bottom graph is actually 7 the FDR elevator. You see with each elevator input, it 8 does also change the load, also. 9 MEMBER BLACK: Right. Thank you. Sorry to 10 slow things down there, but I thought those were 11 important points. 12 Actually, I have one more for Mr. Kolly. You 13 mentioned a minute ago that -- or someone mentioned 14 that there were 34 aircraft in the fleet about the time 15 this accident occurred, and we had three airplanes that 16 had extraordinary wear rates. That would be 981, 982 17 and the accident airplane 963. 18 So, if there had been some sort of grease contamination by mixing or by all Aeroshell or all 28 19 20 or some mixture, all of these airplanes were being 21 lubricated in the same general locations, were they 2.2 not? 23 MR. GUZZETTI: Yes. I could probably address that a little bit better. 24 25 Pretty much, yeah. Most of Alaska Airlines

fleet of MD-80s were being lubricated either at Oakland during their C check, or during -- at San Francisco on the line. Maybe 20 percent of their fleet were getting lubes on the line in Seattle or Los Angeles, but for the most part, San Francisco and Oakland were the places that the lubrications were occurring.

7 MEMBER BLACK: So, I think I pulled one out 8 of your data and it was a sister ship to 963, I believe 9 it was 965, and it had almost identically the same 10 lubrication history, yet it had an average wear rate.

MR. GUZZETTI: That's correct. We found that other than those three airplanes that were highwearing, the rest of Alaska's MD-80 fleet, no matter where it was lubricated, had an excellent wear rate, less than -- less even than the Boeing average of 1,000ths per thousand flight hours.

MEMBER BLACK: About 70 something percent ofthem, I think, had less than average, yes.

19 MR. GUZZETTI: Right.

20 MEMBER BLACK: So, thank you.

ACTING CHAIRMAN CARMODY: Mr. Kolly, this is on grease. As I recall, you said in your presentation that there was no evidence of corrosion, that the damage, the wear damage you saw was what you would expect, but it was not corrosive, is that correct?

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1 MR. KOLLY: Yes, and our chemical analysis in 2 the exposure tests did not indicate that the grease 3 would be -- is corrosive, but further, the most significant evidence is on the recovered remnant 4 5 itself. The opposite side -- the thread of the acme 6 nut has a wear side and a non-wear side. The opposite side, the non-wear side, is original. It's original 7 with its as-machined surface and the recovered 8 condition still shows the original machining. So that, 9 10 we know that the surface wasn't attacked in any 11 significant way by corrosion during its entire life. 12 ACTING CHAIRMAN CARMODY: I raise that 13 because I was reading the Alaska submission, the party 14 submission, and they were talking about Aeroshell and saying it was corrosive to material and that jackscrew 15 assembly wear rates associated with Aeroshell 33 use 16 17 are three to 10 times greater than wear rates associated with Mobil 28. 18 19 Do you have any comment on that? 20 MR. KOLLY: Alaska Airlines and some 21 consultants working for them conducted a wear test 22 program and that is where that three to 10 times wear 23 rate comes from. 24 We had several independent reviews of that 25 entire volume of information, one by Rensselaer

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Polytechnic, one by the FAA, another less formal one by 1 2 Boeing, and the data do not support that conclusion. 3 It was -- they were extensively looked at and there's 4 no evidence in the data that that conclusion can be 5 supported. 6 ACTING CHAIRMAN CARMODY: Good. Thank you, 7 Mr. Kolly. 8 Member Goglia had a follow-up question, I 9 believe. 10 MEMBER GOGLIA: Yes. Mr. Kolly, this goes to 11 you. 12 The -- as we've just mentioned in Mr. Bower's 13 presentation, the loads got as high as 24,000 pounds. 14 Where does that fit with the upper end testing that you 15 performed? 16 MR. KOLLY: Well, that was during the failure 17 sequence and that doesn't have anything to do with the 18 operating conditions associated with wear of the 19 jackscrew. That was during the failure. So that, that 20 wouldn't be a normal wear-operating environment. 21 MEMBER GOGLIA: And what was the higher limit 22 that you used in the testing? 23 MR. CLARK: The highest pressures we examined 24 were above 8,000 psi. 25 MEMBER GOGLIA: Okay. Thank you.

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ACTING CHAIRMAN CARMODY: No other questions
 at this time. Let's move to the next presentation,
 please.

4 MR. RODRIGUEZ: Because -- thank you, Madam 5 Chairman.

Because the acme nut threads on the accident airplane failed as a result of excessive wear, the investigation examined the lubrication and end-play inspection procedures and the intervals that were in place for these procedures prior to the accident.

11 At this time, Mr. Jeff Guzzetti will describe 12 the procedure for lubrication and inspection of the 13 jackscrew and discuss the extension of intervals 14 between these activities.

15 MR. GUZZETTI: As we have already noted, 16 lubrication of the jackscrew assembly is required to 17 minimize the rate of wear of the acme threads. 18 Previous service history has shown that inadequate 19 lubrication causes accelerated wear of the jackscrew 20 assemblies. This is documented in three Douglas All 21 Operator Letters issued in 1967, '84, and '91, and they 22 were issued to remind airlines to lubricate the 23 jackscrew as per their recommended procedure. These 24 three All Operator Letters were prompted after 25 discoveries of several prematurely-worn jackscrews due

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1 to a lack of lubrication.

The lubrication procedure first involves 2 3 gaining access to the top of the tail assembly. Typically, this is performed with the use of a small 4 5 lift bucket truck as shown here in this slide while the 6 airplane is parked overnight. Several panels are then 7 removed. Grease is then applied under pressure to the single acme nut fitting that Mr. Epperson referred to 8 with the use of a grease gun. The mechanic is to pump 9 10 the gun until grease exit out of the top of the acme 11 nut.

12 The procedure then calls for a brush 13 application of a light coat of grease to the jackscrew 14 threads. So, not only do you have to hit the zerk 15 fitting but then you have to apply grease to the entire 16 length of the acme screw. This is followed by cycling 17 the jackscrew through a full range of travel to 18 distribute lubricant across the jackscrew.

19 Staff noted many differences in the methods 20 used by personnel from various airlines to accomplish 21 certain steps of the lube procedure, including the 22 manner in which grease was applied to the acme nut 23 fitting and to the screw. For example, several of the 24 methods observed by or reported to investigators did 25 not involve application of the grease to the entire

length of the jackscrew. There's two access panels
 that you have to get to and to get the top part and the
 bottom part of the jackscrew.

4 Staff also noted that the size of the access 5 panels was not the optimum for the procedure and you 6 could see in that slide Dr. Malcolm Brenner's hand just 7 beneath one of the access panels to give you a sense of the size. Additionally, laboratory demonstrations 8 9 established that applying grease only through the acme 10 nut fitting did not provide an adequate amount of 11 grease over the remainder of the acme screw. It was 12 also noted that the lube procedure is not required to 13 be inspected after it is to be performed.

As a result of these observations, Safety Board recommendations were issued last year and since the lubrication procedure has been revised. However, staff is proposing additional recommendations in this draft report.

A very significant aspect of this
investigation focused on Alaska Airlines extension of
the lubrication interval. A review of records
indicates that the interval for jackscrew lubrication
was extended four times with no objection from the FAA
between March 1987 and July 1996. As you can see here,
the Alaska Airlines interval criteria was based

exclusively on flight hours in 1987 at 500 hours as 1 shown by the top yellow bar. Eventually, in July '96, 2 3 the criteria was changed to eight calendar months without regard to accumulated flight hours. It was 4 5 just by calendar time. Because of the increased 6 utilization of Alaska Airlines airplanes during this 7 time, this eight-month calendar interval was equivalent 8 to 2,550 hours as shown by the bottom yellow bar.

9 The investigation did not determine what 10 information, if any, was presented as justification for 11 the interval extensions in '88, '91, and '94. However, according to an FAA inspector who reviewed and accepted 12 the 1996 extension, Alaska Airlines presented the 13 14 recently-extended manufacturer's lube interval, shown 15 in the lower blue bar, as justification with no internal airline data to support the extension. 16

17 Staff believes this was inappropriate because 18 each airline operates their airplanes under unique 19 circumstances that require unique FAA oversight and 20 data justification, regardless of the manufacturer's 21 recommended intervals.

Additionally, in the wake of the most recent extension there in 1996, in '97, Alaska Airlines replaced Mobilgrease 28 with Aeroshell 33 for jackscrew lubrication without following appropriate internal and

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standard industry practice procedures which dictate that the intervals should actually be decreased when a grease change is made until data shows its successful service history has been achieved.

5 In sum, Alaska Airlines extended lubrication 6 intervals increased the likelihood that a missed or 7 inadequate lubrication would result in excessive wear.

8 As I mentioned on the previous slide, the 9 manufacturer's recommended lubrication interval was 10 also extended. In 1964, the original Douglas 11 lubrication specification for the jackscrew called for 12 an interval of between 300 and 350 flight hours. One year later, when the DC-9 was introduced into service, 13 14 the recommended interval was increased to 600 to 900 15 flight hours. In 1996, this interval grew to 3,600 16 flight hours through a process that's coordinated by 17 the FAA that involved maintenance steering groups or MSGs and maintenance review boards or MRBs. 18

19 The investigation found that this process, 20 these processes, MSG, MRB as well as local airline 21 extensions, by which manufacturers recommend and 22 operators establish their maintenance task intervals is 23 deficient in several ways. For example, those 24 processes do not ensure that the resulting intervals 25 account for the assumptions of the original airplane

designers, are supported by adequate technical data, and take into account the possibility of missed or inadequate accomplishment of the task. The draft report contains several recommendations aimed at addressing these deficiencies.

6 The jackscrew also requires an inspection 7 procedure known as the end-play check, and first, I'd 8 like to give you a little background about the genesis 9 of this end-play check procedure. When the DC-9 first 10 entered service in the mid-'60s, the jackscrew was a 11 life-limited part at 30,000 flight hours. There was no 12 procedure to monitor wear. There was no end-play check. However, in 1965, Douglas initiated a sampling 13 14 program to monitor how their new jackscrews were doing. 15 Jackscrews were removed from airplanes that were part 16 of this sampling program. The jackscrews that were 17 removed were placed on a bench and they had their end 18 play bench checked under a controlled environment. 19 This effort led to the discovery of six high-wearing 20 iackscrews.

In 1967, as a result of these findings, Douglas made some changes to the screw metallurgy and they also increased the wear limits for the jackscrew and acme nut. They also developed a procedure to monitor the wear while the jackscrew remained on the

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1 airplane and this is the birth of the end-play check 2 back in '67, and it basically allowed the operator to 3 check the wear without having to remove the jackscrew 4 from the airplane.

5 This ad hoc procedure was developed with 6 common tools that were already available to the 7 airlines. The tools included a horizontal stabilizer 8 restraining fixture that had been used solely to remove 9 and install jackscrews, a dial indicator, and a torque 10 wrench.

11 The purpose of the end-play check is to 12 monitor the wear of the acme nut threads without having 13 to remove the jackscrew from the airplane. The 14 procedure involves pulling down on the horizontal 15 stabilizer by applying a specific amount of torque to 16 the restraining fixture to change the load on the acme 17 screw from tension to compression. The movement or end 18 play between the gap of the acme nut and the acme screw 19 is measured with a dial indicator. The movement is 20 picked up by a plunger at the back of the indicator and 21 read in thousandths of an inch.

A new jackscrew has a gap of between 3,000ths of an inch and 10,000ths of an inch, as shown in that top illustration. Eventually, the gap increases as the acme nut threads wear down, as shown in the bottom

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1 view.

To quickly summarize how the end-play 2 3 procedure works, the stabilizer is moved to a pre-4 determined position from the cockpit, tail fairings are 5 then removed, and then the restraining fixture is 6 installed between the horizontal and vertical stabilizer, as you see here. The dial indicator is 7 then clamped to the bottom of the screw. The indicator 8 plunger is positioned against the bottom of the acme 9 10 nut, as you see there. A pre-load is applied to the 11 indicator probe and a reading is recorded. Then the 12 restraining fixture is rotated with a torque of between 250 to 300 inch pounds to change the load direction on 13 14 the jackscrew assembly. The dial indicator is then 15 read and there's some interpretation required that I'll 16 mention in a moment.

17 The torgue on the restraining fixture is relieved and the dial indicator is checked to ensure it 18 19 has returned to the initial setting. The steps are 20 repeated several times to ensure consistent results 21 within a thousandths of an inch and then, finally, the 22 mechanic checks that end-play limits are between the 23 upper -- excuse me -- between the lower limit of 3,000ths of an inch and the upper limit of 40,000ths of 24 25 an inch. Readings less than the 3,000ths limit or

1 greater than the 40,000ths inch limit is cause for 2 replacement of the jackscrew assembly. That's when you 3 know your jackscrew is worn.

4 Another significant finding in the 5 investigation was Alaska Airlines extension of the end-6 play check interval between March '85 and April '96, again with no objection from the FAA. This bar chart 7 shows the airline's extension in yellow. The beginning 8 9 interval was set at every other C check or 5,000 hours. 10 In July '88, the airline no longer used the flight 11 hour limit for the C check. Rather, it based C checks 12 on calendar time only, so that the end-play check was being performed at a 26-month calendar interval. Based 13 14 on the airline's utilization rate at that time, this 15 equated to 6,400 flight hours between inspections. This interval was increased again in April 1996 and the 16 end-play checks were being performed every 30 months, 17 18 again with no regard to flight hours.

Because the Alaska Airlines increased fleet utilization at that time, the interval between the endplay checks occurred approximately every 9,550 flight hours. By contrast, the manufacturer's recommended interval at that time, shown in the lower blue bar, was every 30 months or 7,200 flight hours, whichever comes first.

1 After the accident, the FAA established more 2 stringent lubrication and end-play check intervals by 3 way of the Airworthiness Directives that Mr. Rodriguez mentioned. However, during the investigation, we 4 5 learned that extremely rapid wear mechanisms are 6 possible and we became concerned that the 2,000-hour end-play check interval that's currently in effect may 7 8 still not be conservative enough. Therefore, the draft 9 report recommends that the FAA establish a more 10 scientifically-based end-play check interval.

11 The Systems Group conducted hundreds of on-12 wing end-play tests at several airline maintenance facilities across the country. We found that the end-13 14 play check procedure was somewhat cumbersome and 15 susceptible to measurement error. We determined that 16 several variables could affect the accuracy and the 17 reliability of end-play readings, such as installation of the dial indicator, difficulty in reading the dial 18 19 indicator due to its small size, its upside-down 20 mounting, and its backwards needle movement, adverse 21 working conditions, restraining -- the condition of the 22 restraining fixture, the amount of torque applied to 23 the restraining fixture, and the direction in which 24 that torque is applied. The amount of rotation the 25 acme screw would experience during end-play check also

### EXECUTIVE COURT REPORTERS, INC. (301) 565-0064

1 had an effect.

In the case of the accident airplane, a 2 3 fabricated restraining fixture was used during the last end-play check in 1997. This Alaska Airlines-4 5 fabricated tool did not conform to Boeing 6 specifications and the Systems Group documented several 7 differences between the two tools. 8 Because the Systems Group discovered that there are many variables that can affect the end play, 9 10 we were concerned about its reliability and its 11 validity for monitoring the wear of such a critical 12 Therefore, we asked Dr. Jana Price to perform item. 13 some statistical work on end-play measurement data that 14 were reported to Boeing and the FAA as a result of the 15 Airworthiness Directive issued after the accident. So, before we invite questions on this part 16 of the report, I would like to ask Dr. Price to briefly 17 describe her work in this area. 18 19 Dr. Price? 20 DR. PRICE: Good morning, Madam Chairman and 21 Members of the Board. 2.2 Today, I will discuss the Safety Board's statistical end-play data study. I will describe 23 24 results from two analyses that were conducted to assess 25 the reliability and validity of the on-wing end-play

measurement. Reliability and validity are two 1 necessary features of an effective measurement system. 2 3 By reliability, I'm referring to the ability of the on-wing end-play measurement to yield consistent 4 5 or repeatable results. If a measure is not reliable, 6 then it cannot provide accurate results. Reliability 7 was examined using end-play data collected as a result 8 of an Airworthiness Directive mentioned earlier by Mr. 9 Rodriguez which directed operators to perform end-play 10 checks at intervals of 2,000 flight hours or less.

The Board received a total of 3,174 on-wing end-play measurements from 1,493 airplanes and 44 operators. According to Boeing estimates, very little change in actual end play is expected to occur over a 2,000-flight hour interval and all changes are expected to be in an increasing direction.

17 In order to assess the degree of similarity 18 between two consecutive measures, we used a correlation 19 analysis that determined the relationship between the 20 first and second measures for 852 jackscrew assemblies. 21 The correlation analysis produces a value known as the 22 correlation coefficient or R. R can range between 23 negative 1 and positive 1. An R value of positive 1 24 would indicate a perfect correspondence between two 25 measures, such that, when one increases, the other

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increases proportionally. R values closer to zero would suggest that the measure is not repeatable and there's more measurement error.

In the current setting, we would expect a very high R value since we would expect very little change in the end-play measure over the course of 2,000 flight hours. As an example, if there was a measurement error of plus or minus 5,000ths in the endplay measure, the R value would be around .85.

10 This scatter plot represents the raw data 11 collected at Time 1 which is shown on the X axis along 12 the bottom and Time 2 which is shown on the Y axis along the side. The blue line represents where we 13 14 would expect all of the dots to be tightly clustered if 15 there was a strong positive correlation between end-16 play measures at Time 1 and Time 2. This line 17 represents the anticipated wear based on Boeing's estimate of 1,000ths of an inch per 1,000 flight hours, 18 19 positioned to agree with the initial end play.

In fact, as you can see, the dots are fairly widely scattered, and in addition, there are numerous cases in which the second measure of end play was substantially smaller than the first measure. For example, in the case I have circled, the end play measured 35,000ths at Time 1. At Time 2, it decreased

1 to 8,000ths. Since this is not physically possible, we 2 assume that it was due to measurement error.

The wide scatter in the data you see is represented numerically by the resulting R value for Time 1 and Time 2 which was .553. Based on the resulting correlation values, the study concluded that the on-wing end-play test had low reliability.

8 This slide provides another way to see the same data. It displays a histogram representing the 9 10 differences in end play between Time 1 and Time 2. 11 Positive numbers, shown in blue, indicate increases in 12 end play between Time 1 and Time 2. Negative numbers, 13 shown in red, indicate decreases. Since it is not 14 physically feasible for end play to decrease, it is 15 likely that all changes in that direction are 16 attributable to measurement error.

17 If the on-wing end-play measure were highly 18 reliable, we would expect to see a large majority of 19 the cases with differences between zero and 2,000ths. 20 As you can see in this graph represented by the dark 21 blue bar, only about 40 percent of the cases were in 22 this range. The light blue bars represent about 22 23 percent of cases where the end play increased by more than 2,000ths with differences ranging from 3 to 24 25 35,000ths. The red bars represent about 38 percent of

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cases where the end play decreased with differences
 ranging from negative 1,000ths to negative 31,000ths.
 Although I have only shown graphs depicting
 the relationship between Time 1 and Time 2, the results
 were all additional analyses were similar.

6 A second portion of the end-play study focused on an examination of 157 jackscrew assemblies 7 that were returned to Integrated Aerospace, the 8 manufacturer of the jackscrew assembly, during the 2000 9 10 calendar year. At Integrated Aerospace, jackscrew 11 assemblies are cleaned and end-play checks are 12 conducted in a controlled setting known as the bench 13 check described earlier by Mr. Guzzetti. Because the 14 bench check is conducted in a controlled environment, 15 it should provide a better representation of actual end 16 play.

17 For each jackscrew assembly returned to 18 Integrated Aerospace, Boeing contacted operators to 19 obtain matching on-wing end-play data and they were 20 able to do so in 63 cases. Our goal in this analysis 21 was to determine how closely related the on-wing end-22 play measure was to the bench check measure. If they had a strong correlation, it would suggest that the on-23 wing measure is valid. 24

25 In this histogram, positive numbers indicate

# EXECUTIVE COURT REPORTERS, INC. (301) 565-0064

cases where the on-wing check was greater than the 1 2 bench check and negative numbers represent cases where 3 the on-wing check was less than the bench check. The dark blue bar you see here represents six cases or 4 5 about 10 percent where there was no difference between 6 the on-wing and bench check end-play measures. To the right of the dark blue bar, in about 70 percent of 7 8 cases, the on-wing check produced larger end-play measures than the bench check. To the left of the dark 9 10 blue bar, in about 20 percent of the cases, the on-wing 11 end-play check produced smaller measures than the bench 12 check, suggesting that in these cases, the actual state 13 of the assembly was more worn than the on-wing test 14 indicated. In about 10 percent of the cases we 15 studied, this difference was 11,00ths or greater.

16 We also conducted a correlation analysis to 17 look at the relationship between the on-wing and bench check measure. We used the same correlation techniques 18 19 that I described for the reliability analysis. In this 20 case, the resulting correlation coefficient or R was 21 .442. Based on this analysis, we concluded that the 22 on-wing end-play test had low validity as compared to 23 the bench check measure.

In conclusion, the reliability analysis
examining repeated on-wing measures suggested low

## EXECUTIVE COURT REPORTERS, INC. (301) 565-0064

reliability. This is important because reliable or 1 2 repeatable measure is a necessary condition for an 3 accurate measure. Furthermore, the validity analysis using on-wing and bench check measures also suggested 4 5 low validity. 6 As a result of this study and work done by 7 the Systems Group, the NTSB issued a recommendation 8 asking Boeing to revise the measurement procedures and 9 demonstrate that the new method is valid and reliable. 10 This concludes my presentation.

ACTING CHAIRMAN CARMODY: Thank you, Dr.
 Price.

I think in light of the hour, we'll take a short break and then come back for questions because I think there will be quite a few.

16 Why don't we return at 11:15? Thank you.17 (Whereupon, a recess was taken.)

18 ACTING CHAIRMAN CARMODY: Let's come in and 19 take our seats. I'd like to resume.

All right. Let's resume the hearing. Would those who are standing in the door either come in or go out, please? We'd like to get started again.

I guess I have some questions about the intervals and I'll start with Mr. Guzzetti or whoever wishes to answer. I was struck by the fact that the

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1 manufacturer has intervals which include both calendar 2 as well as flight hours, and yet in 1988, I believe you 3 said, Alaska Air went to calendar time only, and I 4 presume -- well, in fact, you said that was approved by 5 the FAA.

6 Do we know what the FAA's analysis of that 7 was or what the rationale was?

8 MR. GUZZETTI: No, we don't, Madam Chairman. 9 Since it happened so long ago, the personalities 10 involved and the paperwork involved disappeared, and so 11 we really don't know exactly how that process worked 12 where the airline was allowed to remove that whichever 13 comes first caveat. So, we just know that it was 14 removed.

ACTING CHAIRMAN CARMODY: Do we know if the FAA inquired after that as to what the actual effect of this was? In other words, what are the flight hours that are -- that correlate to the calendar times as -because the flight hours kept increasing?

20 MR. GUZZETTI: That's correct. The fleet 21 utilization of Alaska did keep increasing within that 22 calendar time. I don't know if the FAA, even in the 23 recent past, were aware that when you escalate -- when 24 they extended their C check to, say, 13 months to 15 25 months, that -- and then they increased their

1 utilization, I don't know if they put two and two 2 together to realize that specific tasks, the flight 3 hour limits, were being extended either.

4 ACTING CHAIRMAN CARMODY: This is your 5 opinion, I realize. Would you expect that's something 6 the FAA should be looking at or should have looked at? 7 MR. GUZZETTI: I would expect the FAA to --ACTING CHAIRMAN CARMODY: So would I. 8 MR. GUZZETTI: -- ride herd on that. 9 10 ACTING CHAIRMAN CARMODY: I have another 11 thought along those lines and it's floating around up 12 here. I think it's just floated out. 13 Let me go to another question I had. On Page 14 253, middle paragraph, we're talking about the MRB-3 15 extension of the manufacturer's recommended interval, and there's a sentence there, starting on Line 8, that 16 17 says, "Further, Boeing design engineers were not 18 consulted about nor aware of the extended 3,600-hour

19 MRB recommended lubrication interval."

Who made the decision about this interval, if none of the engineers at Boeing were consulted? MR. GUZZETTI: Well, the MRB process involves people coming together from industry, airline

24 representatives, manufacturer representatives, but not 25 necessarily the original design engineers from the

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1 manufacturers. They're usually folks that work in the 2 maintenance area and don't typically talk to the design 3 folks, and by committee, with the FAA simply setting up 4 the meetings and kind of coordinating it all, by 5 committee consensus, they look at whatever data they 6 have and make decisions about extending certain 7 maintenance task intervals.

8 So, we don't have any -- we asked whether 9 there were meeting minutes for the particular MRB-3 MD-10 80 meetings. There were none to be found. So, we 11 really don't have a firm idea on exactly who proposed 12 3,600 hours or why it was proposed and what type of 13 data was presented.

ACTING CHAIRMAN CARMODY: I believe you used the words "FAA sets up the meetings and coordinates it", and I think those words were the same that FAA used in our hearing about three years ago on this or two years ago.

19 Is that your understanding of the FAA's role,20 strictly coordinating the meetings?

21 MR. GUZZETTI: IT is. It is my 22 understanding. They play a very limited role. We had 23 the chairman of the MD-80 Maintenance Review Board at 24 the public hearing, and he concurred with the fact that 25 the FAA kind of hosts these meetings and coordinates

1 them, but in terms of approving the intervals or

2 playing an active role in them, that doesn't appear to
3 be taking place.

ACTING CHAIRMAN CARMODY: I remembered my other question about intervals. We were talking about the fact that Alaska was using a calendar as opposed to calendar hours. Any other airlines do that?

8 MR. GUZZETTI: There are other airlines that do that for other maintenance tasks, and I don't know 9 10 exactly which airlines and which specific maintenance 11 tasks, but yes, there are other airlines out there that strictly use calendar time, but a survey that we did of 12 13 operators of DC-9s and MD-80s for the C check that's 13 14 involved with the jackscrew end play and for the 15 lubrication, all of them, except for Alaska Airlines, 16 had a calendar time or a flight hour, whichever comes 17 first, according to our survey.

18 ACTING CHAIRMAN CARMODY: Okay. Thank you.19 Member Hammerschmidt?

20 MEMBER HAMMERSCHMIDT: Well, just following 21 up on Chairman Carmody's last question, at the time of 22 the accident, how did a time frame of 9,550 flight 23 hours for end-play checks as an interval, how did that 24 compare to, say, other airlines that were operating MD-25 80s?

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1 MR. GUZZETTI: According to the survey that 2 we performed where we contacted these 13 operators, and 3 by the way, each of these airlines had at least 10 airplanes, so they were the big ones, it was the second 4 5 highest of those 13 airlines. The first highest was an 6 airline that had an interval of 10,500 hours and then Alaska Airlines came in second with 9,550, and then 7 most of the rest of them, there was one here at 8,400 8 hours, and then the rest were around the 7,200 flight 9 10 hour, and then there were a few that were down into the 11 3,000 and 5,000 range.

12 MEMBER HAMMERSCHMIDT: Okay. Thank you. 13 We point out in the Analysis Section of this 14 report on Page 274 that, on Line 7, the Safety Board is 15 aware that Boeing is currently developing improved end-16 play check procedures.

17 Could someone elaborate on that? Because it 18 was my understanding that some time early this year, 19 that Boeing briefed the Safety Board on these new 20 procedures and in fact many of you actually went over 21 to Reagan National Airport and participated in and 22 experienced how those new procedures -- how they were 23 effective.

24 MR. GUZZETTI: Certainly. Yeah. As a result 25 of the hundreds of end-play checks that the Systems

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Group did over a period of, you know, two-three years, the Systems Group started experimenting with what we thought might be better ways, improved ways to get a more repeatable measure on the jackscrew end play, and Boeing took the ball and ran with it, and they actually are working on, and I think they're very, very close to fielding the new end-play check procedure.

8 According to Boeing, it's greatly improved because they take a lot of the variables out of the 9 10 process. It will involve a restraining fixture where 11 it'll just have a green band and a red band. Rather 12 than worrying about whether you're putting 250 inch pounds of torque on the restraining fixture or 300 inch 13 14 pounds of torque, you'll be able to just intuitively look at a needle and once you're in that range, you're 15 16 okay.

17 Also, the dial indicator face is mounted on 18 top of the acme nut instead of below it and if you 19 noticed on top of the acme nut, there's this very large 20 banana fairing that you have much more access to access -- to install the dial indicator. The new dial 21 22 indicator is also a very large dial. You don't need an inspection mirror to view it, like you did with the old 23 24 procedure, and you don't have to interpret what the 25 indicator is saying. With the old dial indicator, you

1 had to kind of subtract from 100 and with an inspection 2 mirror and it was a bit cumbersome.

3 So, they've implemented that, and they've also implemented an anti-rotation device where you 4 5 don't have to worry about the jackscrew rotating which 6 the Systems Group found can throw off your reading. 7 So, that's just -- those are just some of the major aspects, and it's -- according to Boeing, they tested 8 9 this procedure and they have greatly enhanced the 10 repeatability of the measure. 11 MEMBER HAMMERSCHMIDT: Hm-hmm. 12 MR. GUZZETTI: Also, just to conclude, you're 13 right. Boeing set up a -- partnered with American 14 Airlines and set up a demonstration for several Safety 15 Board staff to actually perform this new procedure. 16 Mr. Rodriguez and myself and several others here did it 17 at night, at about midnight, several months ago. 18 MEMBER HAMMERSCHMIDT: Did you take various 19 end-play measurements? 20 MR. GUZZETTI: Yes, we did. 21 MEMBER HAMMERSCHMIDT: I mean, among 22 yourselves? 23 MR. GUZZETTI: Yes, we did. 24 MEMBER HAMMERSCHMIDT: How did those compare? 25 MR. GUZZETTI: They -- we all came up with

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1 the same number.

2 MEMBER HAMMERSCHMIDT: Same number. Okay. 3 Do you recall what that number was, by any chance? 4 MR. GUZZETTI: I think it was -- I don't 5 recall. It was within limits. It was in the 18,000ths 6 or 22,000ths. I don't recall. 7 MEMBER HAMMERSCHMIDT: Not important. I was 8 just curious. 9 Speaking of Mr. Rodriguez, I was with the 10 investigator-in-charge at Alaska Air's Oakland 11 maintenance facility, observing an end-play check and 12 lubrication, months ago, and you had mentioned in reference to one of Member Black's earlier questions 13 14 that most of the lubrication in the Alaska Airlines 15 system was accomplished at Oakland and at San Francisco International Airport, is that correct? 16 17 MR. GUZZETTI: Yes. Yes, that's correct. 18 MEMBER HAMMERSCHMIDT: Okay. I'd like to 19 shift from the process of intervals to the actual work 20 where the grease meets the metal, so to speak, and on 21 Page 249, which is in the analysis, we have a sentence 22 on Lines 16 and 17 which I'll just read. 23 It says, "This suggests that the SFO 24 mechanic", meaning the mechanic at San Francisco 25 International Airport, "who was responsible for

lubricating the jackscrew assembly in September 1999 did not adequately perform the task", and this was the mechanic who was responsible for performing the last lubrication of the accident airplane's horizontal stabilizer components, including the jackscrew assembly.

7 When we say that this mechanic did not 8 adequately perform the task, what leads us to that 9 conclusion?

MR. GUZZETTI: There are several things that leads us to that conclusion. Let me list some of them. First of all, Mr. McGill and Mr. Rodriguez interviewed that mechanic and that mechanic didn't appear to have a solid knowledge on the actual lubrication procedure.

15 Secondly, the Systems Group went back to the wreckage at Oxnard, granted it was two years after the 16 17 wreckage, but we examined every single grease fitting 18 on that tail of the wreckage, and we noted that at 19 least 40 percent, about 40 percent of the grease 20 fittings on the -- that are used in that task card for 21 the jackscrew and the elevators were either dry or 22 semi-dry. We compared that with other systems, most 23 notably the rudder system, which was lubricated several months before the SFO lube, and just about all of the 24 25 fittings on the rudder had fresh, what we would

1 determine as fresh, grease.

2 So, that was the second aspect, and the final 3 aspect and perhaps the most compelling is when we pulled the jackscrew out of the ocean, the working area 4 5 of the acme screw was void of grease. It didn't have 6 much on it, and when you compare that fact with Dr. 7 Kolly's aspects about what salt water does to grease, which isn't much, as well as other jackscrews we pulled 8 out from the bottom of the ocean, most notably the 9 10 China Air jackscrew, even an impact with the ocean and 11 sitting on the ocean floor for a few days, you should 12 still be able to see some remnants of grease on a 13 jackscrew, and we didn't in the case of Alaska 14 Airlines. 15 If the San Francisco lube would have been 16 done adequately, staff feels that we would have seen 17 some evidence of that on the screw. 18 MEMBER HAMMERSCHMIDT: Hm-hmm. And how long 19 should it typically take for a mechanic to perform the 20 lubrication procedure? 21 MR. GUZZETTI: We asked that of Boeing and 22 they put their maintenance task folks on it, and they 23 came up with an estimate, including removing access 24 panels between, I think, three and a half to four 25 person hours, and however, when we asked the mechanic

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1 that did perform the lube, he indicated it took him 2 about an hour to do the whole thing which also led us 3 to feel that perhaps the procedure wasn't done 4 adequately.

5 MEMBER HAMMERSCHMIDT: Okay. In this Section 6 1, Other Questions, going back to end-play checks, we 7 mentioned in the analysis some work that's been done at 8 Sandia Laboratories concerning a new method of 9 computing the end play on a jackscrew.

10 Could someone describe that somewhat for us? 11 MR. GUZZETTI: Yes, Member Hammerschmidt, I can describe that just to the best of my knowledge. I 12 haven't been keeping up with what they've been doing, 13 14 but right after the accident, Alaska Airlines, through 15 some sort of FAA grant to experiment with new 16 technologies, worked with Sandia to try to devise 17 another method of performing an end-play check.

18 They came up with two experimental 19 procedures. One was simply an x-ray where you bring an 20 x-ray up to the jackscrew and take an x-ray film of it, 21 so you can actually see the wear of the acme nut 22 threads, which is something you can't do now, and then the other technology they used was ultrasound. 23 They would just kind of like when -- during a pregnancy to 24 25 determine the sex of the baby, the same principles

1 would apply to the jackscrew. You run an ultrasonic 2 transmitter over the length of the acme nut and the 3 readings you get on the screen would indicate the 4 thickness.

5 The FAA pulled the funding on those, but I 6 think Alaska Airlines later on began their own 7 initiative to look into that. The Safety Board, the 8 staff really didn't have much of an involvement, other 9 than to report that there could be other technologies 10 out there for this.

11 MEMBER HAMMERSCHMIDT: Very good. I just 12 found that of significant interest. Thinking outside 13 the box a little bit, as the saying goes.

14 One final question. You had mentioned that 15 the staff at least has given us a position that this 2,000 flight hours that the Airworthiness Directive 16 17 calls for to be a limit for an end-play check was 18 perhaps not as conservative as it needs to be, and you 19 mentioned that it was based on a particular occurrence 20 or event, and I believe that's the Hawaiian Airlines 21 jackscrew situation where the garnet ingredients had 22 gotten into the grease and had caused excessive wear. 23 MR. GUZZETTI: That's correct. 24 MEMBER HAMMERSCHMIDT: Is there anything else

25 that that's based on, that position, that 2,000 hours

1 is not adequate?

MR. CLARK: Well, several things. One is, we 2 3 don't know possibly what the worst wear rate is out 4 there. I think Alaska -- the Hawaiian one, we're 5 looking at a wear rate of approximately 13 times the 1,000ths per thousand hours. Can it be worse? 6 We 7 don't know that. So, there's a concern there, and then we would like the -- there's quite a variance in the 8 9 end-play measurements that you see in Dr. Price's data. 10 There's also concern that since this is a critical --11 quite a critical item, that in other systems and structures, we always try to achieve at least two good 12 13 inspections or have the opportunity to discover a flaw 14 twice before we reach a failure mode. 15 So, if you start adding all of those bits and 16 pieces up, we're not convinced that 2,000 hours is an 17 appropriate inspection interval. Very well could be 18 less. If they go through a systematic process, it may 19 be greater than 2,000 hours, but we don't know that 20 answer yet. 21 MEMBER HAMMERSCHMIDT: All right. And what 22 is our suggested solution for that? 23 MR. CLARK: Well, there's several. One is to 24 work at the reliability and validity of the 25 measurements and also the -- one solution that would

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simply take it off the table is to put on some sort of fail-safe device or some device that could mitigate any type of failure and that buys you the extra protection and then you don't have to worry so much about the appropriateness of the 2,000-hour inspection interval or the inspection techniques.

7 MEMBER HAMMERSCHMIDT: Okay. Thank you.8 That's all I have.

9 ACTING CHAIRMAN CARMODY: Member Goglia?
 10 MEMBER GOGLIA: Excuse me. I have a few
 11 questions.

Mr. Clark, I'd like to take your comments just one step further. We just heard Mr. Guzzetti talk about the reliability of the new tooling that Boeing has designed to accomplish this task and its repeatability.

Would that have any effect on the commentsthat you just made?

MR. CLARK: We'll certainly take an improvement anywhere we can get it in the entire process. I think there's a number of things we don't know. We were going to address this a little more directly a little later, but if you want to interject that now, I guess we can.

25 MEMBER GOGLIA: In what way?

1

MR. CLARK: Well, --

2 MEMBER GOGLIA: Where are you going to put it 3 later? 4 MR. CLARK: -- I think Mr. Rodriguez is going 5 to discuss the Alaska Airlines Maintenance Program, the 6 FAA oversight of that program, and then we're going to 7 get into a number of issue areas, such as the possible 8 design changes or fixes. Let's see. Another area is 9 the crew decisionmaking process. 10 MEMBER GOGLIA: Flight crew or maintenance 11 crew? 12 MR. CLARK: Flight crew. 13 MEMBER GOGLIA: I think I'd like you to talk 14 about it now. 15 MR. CLARK: Okay. Okay. The -- what I'd like to do is there's been a lot of discussion about 16 17 trying to devise a fail-safe system. We consider this 18 as a single point failure mode that is catastrophic. 19 So, I'd like to step through and describe what we had 20 proposed to -- and why we proposed certain 21 recommendations. 22 As this accident demonstrates, the total loss 23 of the acme threads constitutes a catastrophic single point failure mode. To address this, the draft report 24 25 contains recommendations to eliminate those

catastrophic effects of thread loss by incorporating 1 the fail-safe mechanism or preclude single point 2 3 catastrophic failure modes in any new horizontal systems, any new designs coming out. We think the 4 5 regulations need to be fixed. Ensure that the 6 certification process addresses wear-related failures 7 so that they will not be catastrophic. There was an 8 issue of whether this was a system or structure and 9 where wear should be considered in the design process 10 of this actuator.

I want to make one thing clear, that when we raised this design and certification issue by proposing these recommendations, we don't mean to minimize the importance of the maintenance and inspection failures that occurred to allow --

MEMBER GOGLIA: You sure could have fooled me
by the words you used in the report.

18 MR. CLARK: How's that?

19 MEMBER GOGLIA: That's exactly why I'm

20 pushing on this issue.

21 MR. CLARK: Okay.

22 MEMBER GOGLIA: The words that are used in 23 the report had my blood pressure spiked because of some 24 of the -- especially in the Conclusions where we can't 25 rely upon the maintenance and inspection because that's

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1 the foundation for the whole aviation system.

ACTING CHAIRMAN CARMODY: Let me just jump in 2 3 for a minute. We have not covered the areas that the 4 staff prepared on maintenance and oversight, and I 5 think you raise valid points, but I think we ought to 6 at least have the chance to hear the full picture 7 before we get into this. 8 I wondered if we might go back to the natural order and get into John Clark's presentation a little 9 10 later. Would that be agreeable? So we can cover the 11 maintenance issues. I think we need to finish that part and then go on to this one and then we can have a 12 13 full airing of everything. So, let's continue with --14 MEMBER GOGLIA: Okay. I have some additional 15 questions. 16 ACTING CHAIRMAN CARMODY: Okay. 17 MEMBER GOGLIA: Mr. Guzzetti, you mentioned one carrier had higher times of lube intervals? 18 19 MR. GUZZETTI: Yes, that's correct, Member 20 Goglia. 21 MEMBER GOGLIA: And did we look at what kind 22 of a history they had with jackscrews and replacements 23 and --MR. GUZZETTI: Not in-depth. They did have 24 25 -- well, we cite it in the report. It's Delta Airlines

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that had the highest end-play interval before the 1 2 accident, of course. There were some interesting 3 findings about that. They did have a handful of acme screws that were slightly higher wearing than some of 4 5 the other airlines, but most notably, they had the 6 highest wear on a jackscrew that we had ever seen. Ιt was 75,000ths of an inch, and they had -- this was 7 8 three or four years ago. We never got a chance to look at the screw, but it was pulled from the airplane and 9 10 the records indicate it was 075 inches. So, we didn't 11 take an in-depth look at that airline's jackscrews like 12 we did with Alaska, however.

MEMBER GOGLIA: And you also made a comment when talking about the MRB and the FAA's role there, and you made the comment that the FAA approving. Don't they accept?

17 That's -- in a way, you're MR. GUZZETTI: 18 correct. They do accept task card changes. For 19 example, the individual -- some of the individual task 20 card changes that extended the lube intervals were 21 accepted by the FAA, but we're really talking about 22 semantics here in that Alaska Airlines' entire maintenance program in which this acceptance is 23 discussed is -- that entire maintenance program is 24 25 approved by the FAA.

1 So, technically, in the case of the 2 lubrication extension, the FAA did accept it. In the 3 end-play inspection, technically, you would say approval because that did involve a C check extension, 4 5 but overall, as it relates to the Maintenance Review 6 Board or the MRB process, there really is no approval by the FAA of a specific manufacturer's recommended 7 8 program.

9 The FAA does approve continuing airworthiness 10 instructions, but I'm not too clear on the actual 11 semantics of acceptance versus approval as we discussed 12 this topic.

MEMBER GOGLIA: Okay. I wonder if you would talk a minute, one of you talk a minute about the tooling that was used by Alaska Airlines. We just talked about the new tooling that Boeing has designed.

17 Can you give us a little sketch on what the 18 differences were and what the problems were between the 19 tooling that was used to check the accident airplane 20 and the Boeing-designed tooling and the newly-designed 21 Boeing tooling?

22 MR. GUZZETTI: Certainly. We discovered that 23 Alaska Airlines had fabricated a tool that did not meet 24 Boeing specifications. We discovered it. It took us 25 awhile to discover it. We noted that Alaska's -- we

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1 requested information from Alaska regarding where they 2 got the tool, how they fabricated it. Finally, they 3 provided us the information the day they disclosed to 4 the FAA that they had been using this non-compliant 5 tool on their airplanes and they actually grounded some 6 airplanes and redid the end-play check as a result of 7 that.

8 But basically, we don't know exactly how Alaska Airlines tool was put into their system. 9 We 10 just know it existed there, went all the way back into 11 the '80s, and as you can see on the monitor, it looks different. The Alaska Airlines-fabricated tool is on 12 the left there. It's cylindrical, and -- excuse me. 13 14 It's on the right. It's cylindrical and has two long turn buckles that go into it. 15

The Boeing tool on the left is red. It's rectangular, and it has an open area in there where you can actually see the turn buckles. The turn buckle screws themselves are much shorter than the Alaska tool. So, there's an extension issue.

We looked at the -- after the accident, when the AD came out and Alaska really needed to do a lot of end-play checks to conform to the Airworthiness Directive, they actually took the non-compliant tool and made a clone of it. They kind of reverse

engineered the improper tool and made 11 more of them 1 and used those tools for several months. Meanwhile, 2 3 the Systems Group finally found out about it and we wanted to perform an investigation on whether or not 4 5 this Alaska Airlines-fabricated tool could provide a 6 different end-play reading than the Boeing tool. So, we ran several series of laboratory tests as well as 7 some on-wing end-play checks, and we determined that 8 9 for the most part, the Alaska tool, it would always give a slightly -- in several cases, it gave us 10 11 slightly lower end play, no greater than 5,000ths of an 12 inch. But for the most part, head-to-head, it gave 13 about the same end play as the Boeing tool.

14 We also put it on a force gauge and the 15 Boeing tool provides adequate force, 3,000 pounds of pulling force to really get that jackscrew to unload 16 17 and go in the opposite direction. You only need about 18 1,700 or 1,800 pounds to get a full end play, and the 19 Alaska Airlines tool kind of hovered -- its force 20 output kind of hovered around 1,700-1,800 pounds. So, 21 it was right on the margin, but for the most part, it 22 put out about the same reading.

23 We don't know the condition, Member Goglia, 24 of the fabricated tool that was used during the '97 25 end-play check. We could have -- different readings

could have been attained if the tool was dry, if it wasn't properly lubricated, if it was in a different position. Did the jackscrew rotate back then in 1997? We just don't know. So, we -- our staff's belief is that we can't come up with a solid determination on whether the fabricated tool had any effect or skewed the reading on the '97 end-play check.

8 The Boeing tools, every one we tested, were 9 fine, but it still involved using this torque wrench 10 and it gave a range between 250 inch pounds and 300 11 inch pounds of torque that the mechanic would choose, 12 but now, to answer the last part of your question about 13 what Boeing is proposing, they took all the guesswork 14 out of that. The tool has a little force gauge on it 15 and you just torque it until the needle goes into the green and you're there. You don't have to worry about 16 a specific torque amount. You don't have to worry 17 about a lot of these variables. 18

MEMBER GOGLIA: Okay. And I have one additional guestion for Dr. Powell.

21 MR. GUZZETTI: Dr. Price.

22 MEMBER GOGLIA: Dr. Price. I'm sorry. I 23 wrote it down wrong.

During your presentation, you talked at great length about the findings of the jackscrews that were

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1 returned to overhaul facility and the numbers

2 essentially of findings, the bench level and on-wing,3 comparing them on-wing.

4 Now, it's my experience in doing these checks 5 that we really didn't care very much about the number 6 and consequently, many of those tags that I filled out 7 for other people, I just put a number down that would keep me out of trouble, essentially putting it over the 8 40,000ths limit, and it had really no relationship in 9 10 fact. We would often change jackscrews, replace 11 jackscrews that were close, if we had a jackscrew 12 available, the airplane was in a tail doc, and if we 13 had manpower. It's just a heck of a lot easier to do 14 it at our convenience than it was to run the thing to 15 the end and maybe have to do it in some place that's less convenient or a time when we may not have a spare 16 17 jackscrew.

So, I felt as you were going through those numbers that it would skew the results considerably. Is my feeling correct?

21 DR. PRICE: Well, I think I can answer that 22 in a couple of ways. First of all, not all of the 23 jackscrews that were used in that analysis came off 24 because they were too high. I think what you're saying 25 is that if a mechanic noticed it was too high, higher

1 than 40, for instance, he might not be concerned with 2 what the actual number was, knowing that it would be 3 removed anyhow.

4 The jackscrews that were looked at in that 5 analysis had been removed for a variety of reasons and 6 represented a range of different end plays that were 7 taken when they were removed. Another thing, I think, 8 that would be important to note is that these were all removed in the year 2000 and after the accident, and I 9 10 think at that time, I would suspect that after the 11 Airworthiness Directive was issued and that mechanics 12 knew that their results were being reported to the FAA 13 and the importance of that, that they may have been 14 recording them as well as possible during that period. 15 MEMBER GOGLIA: You mentioned other reasons 16 for removal. What were the other reasons? 17 DR. PRICE: If there was pitting, for 18 example, on the screw or if there were problems with 19 the free play. Those are two examples. Chips and 20 flakes. That was another reason that they might have 21 been removed. Some of them were removed because they 22 were out of tolerance, but there was a variety of 23 reasons that they were removed.

24 MEMBER GOGLIA: Do we have a sense for how 25 many were removed for the flaking, pitting, the wearing

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1 materials showing up?

2 DR. PRICE: I believe it was just a very few 3 that had that reason listed. If I remember correctly, 4 it was just a handful.

5 MEMBER GOGLIA: Okay. Thank you. No further 6 questions.

ACTING CHAIRMAN CARMODY: Member Black?
MEMBER BLACK: I have a couple here.

First of all, Jeff, Mr. Guzzetti, going 9 10 through the -- listening to you talk about the sequence 11 of the -- how the end-play checks and lubrication 12 intervals were arrived at, I'm a little curious as to 13 how those long maintenance -- those long manufacturer's 14 intervals got in there because at the same time, I 15 believe in the docket, in the factual, there were 16 several All Operator Letters that went out, the first 17 one in the '60s, then maybe one or two more in the 18 '80s, from McDonnell-Douglas to the operators saying 19 we're getting wear rates that are higher than we 20 expected. We know what they were from this test that 21 we did back during the '60s, and we believe that it's 22 lubrication, based on some basis.

Is there a disconnect somewhere between whoever is writing those letters and whoever is giving advice to the FAA and these maintenance steering

1 groups?

2 MR. GUZZETTI: Just based on my review of the 3 facts, I would say there very much was a disconnect. 4 You're correct. There were three AOLs that were issued 5 that I mentioned, '67, '84, and '91, and then when the 6 -- in 1996, I think, when MSG-3, MRB came out for the MD-80, suddenly it went to 3,600 hours which was a five 7 to six times jump in lube interval for the jackscrew, 8 and I think part of the problem was, is the lube 9 10 interval itself wasn't really looked at specifically by 11 the MRB. They kind of were looking at the C check extensions as a package, and the lube happened to kind 12 13 of fall nicely into a C check, and so they just -- for 14 whatever reason, it got absorbed into that C check and 15 turned into 3,600 flight hours. But I would agree with you that there was 16 plenty of literature out there spanning three decades 17 18 that indicated that frequent lubrication is very much 19 needed for the jackscrew assembly. 20 MEMBER BLACK: Okay. Thank you. 21 I'm going to take them in order that I wrote 22 them down. Something you didn't mention on this lubrication overnight at SFO, to perform the 23 24 lubrication as required in the manual. It actually 25 requires two people at least at one point to do that,

1 two mechanics, does it not, because of running the 2 jackscrew up and down?

3 MR. GUZZETTI: Oh, yes, sir. MEMBER BLACK: Somebody has to be in the 4 5 cockpit. There has to be power on the airplane, and --6 MR. GUZZETTI: And then somebody has to be in 7 the tail. 8 MEMBER BLACK: -- someone has to be in the 9 tail talking and also there has to be a headset run out 10 so that they can talk to each other. So, that further 11 complicates that process and makes it take longer.

12 MR. GUZZETTI: That's correct.

MEMBER BLACK: I'm not criticizing that. I'm just saying that's something else that needs to be done during that interval.

MR. GUZZETTI: That's correct, and there was more than one -- I believe there was more than one mechanic working at that station that evening. So, it's certainly feasible that that happened.

And if I may just make a quick comment here about the SFO mechanic and this issue? As you made a note in our factual analysis, we certainly don't -staff doesn't assert the fact that the procedure simply wasn't done. We just assert that the acme screw wasn't adequately lubricated, and there could be several

1 reasons for that.

2 MR. CLARK: One other key point on that last 3 lubrication is we also, looking at the wear rates and the testing that Dr. Kolly's performed, is that that 4 5 last lubrication in and of itself isn't the problem 6 one. 7 MEMBER BLACK: No. MR. CLARK: It's to -- if the grease can 8 9 perform that 2,500-hour interval, it will -- we expect 10 it to go some time beyond that 2,500-hour interval 11 before we start getting into a problem. So, if we 12 missed the last lubrication and/or performed it 13 inadequately and there's not a lot of grease up and 14 down that jackscrew, we would have had to have gone 15 some period beyond that and then gone into an extremely 16 high wear rate, orders of magnitude greater than 17 anything we've ever measured to get to that failure 18 point. So, that in and of itself, that last 19 lubrication isn't the one that put us in a high wear 20 rate. 21 MEMBER BLACK: And just another benchmark, I 22 guess, that it ought to be fair to point out here, is 23 that this airplane at the time, this airplane series at the time of the accident had close to a 100 million 24 25 fleet hours on it and never one of these -- never

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documented and apparently never had one of these catastrophic jackscrew assembly failures before. So, that means that a wide range of lubrications out in the field over the years had kept these things going and there had not been one before.

6 So, whatever it was, it couldn't be just a 7 simple issue. It had to be a complex issue. Would you 8 agree with that?

9 MR. CLARK: I agree.

MEMBER BLACK: Going through, we have mentioned American here a couple of times and their splendid cooperation in this investigation. Three of us at least visited Tulsa once to look at their operation. You might talk a little bit about their interval and their practices and what it led to with regard to wear rates, if you could.

MR. GUZZETTI: Certainly. American Airlines
was one of the lowest interval --

MEMBER BLACK: It's also the largest operator
in the world of the airplane, too.

21 MR. GUZZETTI: That's correct. Now that 22 they've acquired the old TWA, they've got 400 and some 23 DC-9 MD-80 series.

24 MEMBER BLACK: I think they'd be willing to 25 sell you a few right now, too.

MR. GUZZETTI: And they were, I think, the largest operator even before they acquired TWA. But in any event, their interval was -- let me find it here --940 hours for lubrication and that is, you know, fairly consistent for the 600 to 900 hours that the original lube interval came when the DC-9 was rolled into service in '67 or '65.

8 American Airlines also, even before the 9 accident, were tracking the end-play checks on --10 MEMBER BLACK: We haven't said that before I 11 don't believe in the meeting. When a mechanic checked 12 one of these, they weren't required to write in the 13 aircraft forms what they got, what the results of the 14 check were.

MR. GUZZETTI: That is correct. It wasn't mandatory to actually write down what the end-play check was.

MEMBER BLACK: So, for instance, on the accident airplane, it had one or two previous end-play checks and we don't know what they were.

21 MR. GUZZETTI: That's correct.

22 MEMBER BLACK: Because they were not recorded 23 nor were they required to be recorded.

24 MR. GUZZETTI: And that somewhat hampered our 25 ability to really zero in on the wear rate of the

accident jackscrew, but American Airlines did, and we looked at -- they provided us the data and just an anecdotal note, you would expect a normal slope of -if you were to plot wear versus time, the jackscrew would slowly -- would wear out as time progressed, but American had kind of a flat line. It was as if their jackscrews were not wearing at all.

8 MEMBER BLACK: Didn't their two oldest 9 airplanes still have the original in them?

10 MR. GUZZETTI: They all -- every airplane in 11 their entire fleet had the original jackscrew and some 12 of those airplanes were fairly old.

MEMBER BLACK: If you followed the guidance given by the manufacturer way back in the '60s, you got a very good result and these things are \$60,000 a piece.

MR. GUZZETTI: That's correct. So, you know, we found that American -- and also, I think they were one of the few airlines that, when the AD came out and they had to inspect and report any jackscrew that had any kind of shavings or an end play that was out limits, they had to report it. They reported no jackscrews out of 267 airplanes.

24 MEMBER BLACK: Thank you.

25 Let me transition one more, Madam Chairman,

to Ms. Price who's helped me two or three times on the phone trying to understand because we engineers are normally statistically challenged.

Do you think -- a lot of these numbers that you worked with were as a result of the original urgent AD for all airlines after the accident to measure, go out immediately and measure all of their airplanes, is that true?

9 DR. PRICE: That's correct. All of the data 10 that I spoke about today was measured as a result of 11 the Airworthiness Directive.

MEMBER BLACK: Okay. What makes me wonder about something is on the scatter that you got on the slide that at least is on our monitor here but is not being shown but it's the wide scatter, at Alaska Air, I noticed that some of the people who are performing endplay checks, when they were interviewed, they had only performed one or two or three in their entire career.

19 I'm wondering if during this race to get 20 these things measured by the airlines so they could put 21 their airplanes back in service, if we didn't get 22 people doing this who had come off the 757 line or the 23 Airbus line or somewhere who really didn't know how to 24 do this, that might have further scattered your data. 25 Do you think that's possible?

DR. PRICE: Well, I do think that inexperience or confusion with how to do the procedure may lead a mechanic to have a problem, yet I feel that that's important because if a mechanic -- a mechanic may never have had to do them very often in the past, and yet the decisions that they were making based on those were so of great importance.

8 One of the --

9 MEMBER BLACK: I totally agree.

DR. PRICE: However, in addition, we have made recommendations about training mechanics on this procedure, on the newly-developed procedure, and that is part of what is in the draft report.

14 MEMBER BLACK: Excellent. I agree with that. 15 And just as a general comment, I would at some point and maybe later is a better time to do it like to hear 16 17 a little bit more about this accept versus approve in 18 the maintenance programs and maybe we can talk a little 19 bit more about that when we get into findings. As the 20 husband of a lawyer, I smell a lawyer somewhere around 21 that, and I'm just wondering what the significance of 2.2 those two words are.

23 Thank you very much.

ACTING CHAIRMAN CARMODY: Member Goglia had a 25 follow-up.

1 MEMBER GOGLIA: Yes. Mr. Guzzetti, go back 2 for a second to the San Francisco lubrications. It's 3 my understanding that there was no tail doc available 4 in San Francisco, is that correct?

5 MR. GUZZETTI: We don't know, Member Goglia. 6 We tried to vet that issue as best as we could. I 7 believe that they did have one. I'm not sure. Mr. 8 McGill may have -- or Mr. Rodriguez may have a better 9 perspective on whether or not there was a lift 10 available at SFO.

MR. RODRIGUEZ: We visited the facility a year and a half after the accident or so and the lift at that time was broken, but it was our understanding that the Alaska Airlines folks borrow a lift if one is broken and they need it.

MEMBER GOGLIA: And did we make an attempt to find out? How long was the out-of-service lift truck that was there when you visited, how long was that in the station?

20 MR. RODRIGUEZ: How long was it out of 21 service or how long had they owned it?

25

22 MEMBER GOGLIA: How long was it in the 23 station? They can own it and it can be somewhere else. 24 MR. RODRIGUEZ: I have no idea, sir.

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MEMBER GOGLIA: And did we ask who they would

1 borrow one from?

MR. RODRIGUEZ: I know we did. I don't 2 3 recall who it was. I made no notes on it. 4 MEMBER GOGLIA: Okay. Thank you. 5 MR. RODRIGUEZ: Yes, sir. 6 ACTING CHAIRMAN CARMODY: Member 7 Hammerschmidt? 8 MEMBER HAMMERSCHMIDT: Thank you. 9 Just two quick points. Following up on 10 Member Black's insights and questions, I might mention, 11 I thought Member Black made sort of a preeminent point 12 when he made fleeting reference to the 100 million hours of experience on the DC-9 series fleet and how 13 14 really until this tragic occurrence we're in this room 15 talking about occurred, there was really not very good situational awareness or context for much of the 16 17 hindsight that we now have. 18 My quick question is concerning the intervals 19 for lubrication of these components. I'm reminded of 20 what we have in the factual report as sort of a leadoff sentence on Page 60, and I'm not sure if Mr. 21 2.2 Guzzetti has referenced this already in his 23 presentations, but they're on Line 8, beginning on Line 8, we say that "Original DC-9 certification documents 24 25 specified a lubrication interval for the jackscrew

1 assembly of 300 to 350 flight hours."

2 Now, how did that in the early stages of DC-9
3 operations get extended?

MR. GUZZETTI: We asked that question, Member Hammerschmidt, and again when you go back to the '60s, it's tough to find any kind of paper trail. However, Boeing's best estimate is that it rolled into the 600 to 900 flight hours a year later when the airplane was put into service because that was kind of their minimum convenient maintenance interval for that.

11 The 300 to 350 flight hours probably didn't 12 fit conveniently into the on-airplane maintenance 13 program that came with the DC-9 when it was rolled out 14 of there.

15 MEMBER HAMMERSCHMIDT: Okay. Well, I just 16 point that out as a point of information, that that was 17 what the original certification documents called for.

18 MR. GUZZETTI: That's correct.

19MEMBER HAMMERSCHMIDT: So, that's all I have.20ACTING CHAIRMAN CARMODY: All right. I think21the next item is Alaska's Maintenance Program, Item 3.

22 Mr. Rodriguez, please.

23 MR. RODRIGUEZ: Yes, ma'am.

As a part of our investigation, we evaluated the Alaska Airlines Maintenance Program and, in

addition to the extension of intervals for both
 lubrication and inspection of the jackscrew assembly,
 we found other significant deficiencies in the
 Maintenance Program.

5 For example, Alaska replaced Mobilgrease 28 6 with Aeroshell 33 without following appropriate 7 internal and standard industry procedures and there was no follow-up evaluation of the grease performance. 8 Alaska used a non-conforming restraining fixture for 9 10 the end-play check procedure and fabricated 11 more 11 after the accident and did not acknowledge the 12 discrepancy until August 2nd, 2000. The high wear 13 rates of the three jackscrew assemblies could not be 14 explained by contamination, surface finish, or anything 15 other than inadequate lubrication, as Dr. Kolly pointed 16 out.

17 2-0 end-play readings resulted in replacement of the jackscrew assemblies on two different aircraft 18 19 at Alaska Airlines as recently as Spring 2002. 20 Inadequate lubrication was found on rudder control tab 21 bearings on two separate aircraft also in the Spring of 22 2002. One bearing fell apart when removed. One of 23 these aircraft had been lubricated about six months earlier while the other was just short of the next 24 25 scheduled lubrication. This information was not

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released until issuance of a Maintenance Information
 Letter, dated July 19th, 2002.

The latter two items serve to underscore the need for maintenance personnel training on jackscrew assembly lubrication and inspection recommended in Recommendations A-0143 and A-0144, respectively, which were issued October 1st, 2001. Both of these recommendations are currently classified in an open unacceptable response status.

10 With respect to FAA oversight, we found in 11 our investigation that FAA surveillance of Alaska's 12 Maintenance Program in general and the Oakland facility 13 in particular had been deficient for several years 14 prior to the accident. The principal maintenance 15 inspector who retired in November 1999, after eight and 16 a half years, stated that they were too busy with 17 administration to do any surveillance. The chief of 18 the Seattle Certificate Management Office stated in a 19 formal memorandum to the Director, Flight Standards 20 Service, November 12th, 1999, that the staffing had 21 reached a critical point. Alaska was in a state of 22 aggressive growth and expansion and the FAA staff was 23 not able to meet the work demands. He concluded that, "The risk of incidents or accidents at Alaska Airlines 24 25 is heightened."

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1 Following the accident, an FAA Headquartersled team conducted a special inspection of Alaska 2 3 Airlines in April 2000. Deficiencies which should have been apparent much earlier were identified in a June 4 5 2nd, 2000, press release, and they included lack of 6 management personnel in that there was no director of maintenance. That job was shared by two people with no 7 8 delineation of their duties. No director of operations and no director of safety reporting to the highest 9 10 level of management. This function was actually 11 combined with director of quality control and training. 12 Alaska Airlines Training Manual did not specify formal training curriculum or on-the-job 13 14 training procedures or objectives. The program had no 15 structure, no identification of subjects, and no criteria for successful completion. The General 16 Maintenance Manual procedures were not being followed 17 and did not include how-to procedures for heavy check 18 19 planning and/or production control. Two aircraft were 20 released to service from C check without completion of 21 necessary paperwork, raising questions about the

22 completion of the work and the airworthiness of the 23 airplane being released to passenger service.

24There were numerous examples of incomplete or25deleted work cards. Absence of a functional continuous

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analysis surveillance program led to numerous other
areas suffering from lack of oversight and reform.
Alaska's program was being controlled by an understaffed quality assurance department. Audits were not
being completed in a timely manner and were incomplete,
so problem areas were not being identified.

7 As a result of this inspection, the FAA proposed the suspension of Alaska Airlines heavy 8 maintenance authority. However, because of Alaska's 9 10 efforts to work with the FAA to correct the 11 deficiencies outlined in the inspection, no suspension 12 was issued. The FAA accepted an action plan proposed by Alaska Airlines on June 29th, 2000, to correct all 13 14 problems. In July 2001, the FAA finally prepared a 15 briefing document on their assessment of Alaska Airlines Maintenance Program. It stated in part that 16 17 Alaska Airlines "convincingly demonstrated its 18 completion of all initiatives and commitments", and the 19 FAA panel had reached a consensus that Alaska Airlines 20 met or exceeded all commitments set forth in their 21 action plan.

In light of the recent maintenance errors by Alaska maintenance personnel, that is, the inadequately-lubricated rudder control tab bearings on two separate aircraft, and the two erroneous end-play

checks,, we remain concerned about the overall adequacy 1 2 of Alaska's Maintenance Program and the ability of the 3 FAA Certificate Management Office and the Northwest Mountain Region to monitor and assess its capability. 4 5 Accordingly, the draft report contains a 6 recommendation for the FAA to conduct a Headquartersled in-depth on-site follow-up safety inspection to 7 8 evaluate the adequacy of the corrective measures 9 implemented in Alaska's June 2000 plan. 10 At this time, we are prepared to answer 11 questions on Alaska's Maintenance Program and FAA 12 oversight. 13 ACTING CHAIRMAN CARMODY: Thank you, Mr. 14 Rodriguez. I was struck by your comments on the lack of 15 16 training, lack of training for the maintenance 17 personnel at Alaska. Would there not have to be -should there not have been a maintenance training 18 19 program which was FAA-approved for the airline or not? 20 MR. RODRIGUEZ: Mr. McGill will handle that. 21 MR. McGILL: Typically, Madam Chairman, 22 maintenance training for mechanics is what we call OJT 23 or on-the-job training. Perhaps initial system training is given at various times. It's not 24 25 regulated. It's not defined. It's not maintained in

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any manner and that's typical of the entire industry. 1 2 Training records are kept on each individual mechanic, 3 however, and in the past, this has been the 4 justification that the FAA has used to accept 5 maintenance training on large aircraft.

6 ACTING CHAIRMAN CARMODY: Thank you, and you 7 mentioned the two FAA recommendations that were in an 8 unacceptable status. They had to do with training.

9 Could you elaborate on the FAA's response on 10 those two, please? I'm assuming they thought it wasn't 11 necessary. I'm just curious to know what they may have 12 said beyond that.

MS. WEINSTEIN: They said that their current 13 14 procedures were adequate and the Board has asked them 15 to reconsider their position.

16 ACTING CHAIRMAN CARMODY: What was the last time we asked them to reconsider? 17

18 MS. WEINSTEIN: It was in June 14th of this 19 year --

20 ACTING CHAIRMAN CARMODY: Okay.

21 MS. WEINSTEIN: -- in our last letter to 2.2

them.

23 ACTING CHAIRMAN CARMODY: All right. Thank 24 you.

Member Hammerschmidt? 25

1 MEMBER HAMMERSCHMIDT: Thank you.

2 As has been described, the FAA has been a 3 prominent presence at Alaska Airlines since the time of this accident, and I know from information that I've 4 5 received from Alaska Airlines that they've been 6 increasing their internal safety audits significantly. 7 I believe I've heard they've conducted something like 1,040 separate internal audits since the time of the 8 9 accident.

10 When you suggest that the FAA needs to go 11 back and take yet another look-see at Alaska Airlines 12 maintenance, are we really basing that on just a few 13 mistakes, let's say, that have been brought to our 14 attention or is there a more pronounced need for that? 15 Because for those of us that have been -- who have 16 visited Alaska Airlines and have been briefed on the 17 new systems that they've implemented in terms of their 18 Safety Committee, their reporting right to the top of 19 the organization, in various ways, it would seem that 20 they have gone a long way to improving their internal 21 methods for enhancing their maintenance safety.

22 MR. RODRIGUEZ: Mr. Hammerschmidt, the 23 staffing at Alaska Airlines Maintenance Department has 24 been increased in accordance with their action plan. 25 I'm not sure what the totals are. I really wasn't able

to keep track of the comings and goings, but mechanics 1 have been hired, I think it's somewhere in the 2 3 neighborhood of a 170 additional positions, since the 4 time of the accident. There have been a total of 5 perhaps 340, I think, was the figure that they used 6 total people added in the Maintenance Department. They 7 have filled these positions that were vacant for two 8 and a half years, and were you also interested in the 9 FAA or just the --10 MEMBER HAMMERSCHMIDT: Well, --11 MR. RODRIGUEZ: -- Alaska maintenance? MEMBER HAMMERSCHMIDT: -- FAA, too. Might as 12 13 well complete the picture. 14 MR. RODRIGUEZ: Yes. At the time of the accident, Alaska PMI had just retired and a new PMI was 15 in training actually when the accident occurred. 16 17 My recollection in rough figures is that 18 there were perhaps seven to nine people assigned to 19 that ticket, to the Certificate Management of Alaska 20 under their Surveillance Program and that figure is now 21 in the neighborhood of over 30. I believe we've heard 22 figures of 32 and 34 and it seems to vary because for 23 quite awhile there, the personnel were not stable. 24 They were advancing and then going other places for 25 promotions and that sort of thing which is

1 understandable.

2 MEMBER HAMMERSCHMIDT: Okay. Well, I was 3 just trying to get more at the aspect of over-auditing 4 an organization.

5 MR. CLARK: We're not interested in, I mean, 6 trying to force an over-audit, but several things that Rod talked about are kind of the underlayment. We had 7 8 several incidents that there were jackscrews being 9 pulled off for zero end-play measurements which 10 indicates that mechanics didn't know how to properly do 11 the job. We had this issue on the lack of lubrication 12 and then a general down-scaling of lubrication 13 intervals, and I'm not sure how widespread that was at 14 Alaska Airlines, but a number of their intervals were 15 down-scaled, and I think the troubling thing to us is it seems that after the accident and what we found on 16 17 the accident, that these types of things would keep 18 coming up, especially in end-play measurements and 19 especially anything doing with flight control 20 lubrications was troubling.

And then, I think that's worrisome to us. The -- and that is -- those are very recent events, after a lot of this infrastructure has been put in place, and then, back in the time of the last audit, they had the ATOS Program in, the PTRS, and there's no

indication -- at the time of that inspection, has all that settled down, and are we back on an even keel? So, it's a worrisome thing because of the several specific things, but even at that, the FAA took more significant action on the cutting back on lubrication intervals.

MR. RODRIGUEZ: I would -- I quess I would 7 point out, also, that the composition of the safety 8 9 inspection that was done at Alaska Airlines was done by 10 an outside source. When the final analysis, they call 11 it the Gate 4 meeting, they were unable to meet the 12 deadlines that were established initially and so they 13 expanded it into several segments that they would 14 approve as they were going along, and the final one was at Gate 4 when they met again to assess the adequacy of 15 16 the Maintenance Program. That's what I quoted in here 17 where they reached a consensus that Alaska Airlines met or exceeded all commitments. 18

I'm not sure what that means in the final report, but to me, it suggests that it was not unanimous, and I see a difference in that word "consensus" versus "unanimous", and we continue to get reports of problems in the maintenance area, unsolicited comments, and for that matter, undocumented largely, but it is troubling to us and it was because

of that that the staff felt that perhaps one more 1 2 independent look at Alaska from the outside would be 3 very worthwhile. 4 MEMBER HAMMERSCHMIDT: Okay. Thank you. That's all I have. 5 6 ACTING CHAIRMAN CARMODY: On that point, did 7 the IG, the DOT IG, not do an investigation of Alaska 8 Air, and could you comment on that, please? 9 MR. RODRIGUEZ: The answer is yes, ma'am, 10 they did. At this point, my recollection of what all 11 they found, I'm not sure that I ever saw the final report from the DOT IG. But there were --12 13 ACTING CHAIRMAN CARMODY: The timing of it. 14 Do we know when it was done? Was it after the FAA's 15 report? MR. RODRIGUEZ: No. It was already in 16 17 process. It had been in process for a year and a half or so at the time --18 19 ACTING CHAIRMAN CARMODY: Oh, I see. 20 MR. RODRIGUEZ: -- of the accident. 21 ACTING CHAIRMAN CARMODY: Oh, okay. 2.2 MR. RODRIGUEZ: There were significant 23 investigations of Alaska Airlines prior to the accident 24 for quite some time. 25 ACTING CHAIRMAN CARMODY: All right. Member

1 Goglia, any questions in this section?

I'm a little bit -- I think I 2 MEMBER GOGLIA: 3 understand what you're saying with the audits and you 4 said a lot of they and they, and I'm assuming that or I 5 get the feeling that some of that was blended. 6 Who did the last audit at Alaska? Do we know when the last audit was done? 7 8 MR. RODRIGUEZ: Yes, sir, we do. I don't have it on the top of my head, but it was -- the last 9 10 audit was run in the Spring of 2000, after the 11 accident. That was a safety inspection that was done, 12 and then the follow-up of completion of those complaints that had been -- findings that had been 13 14 listed, that was done and ended on July 19th, 2002. 15 The composition of the team, I have it in the 16 documents here. I don't have them on the top of my 17 head, but it was headed by -- the inspection was headed 18 by Mr. Ed Hugg from Headquarters of the FAA and 19 included quite a few of the staff from the Certificate 20 Management Office and the region, and the subsequent 21 assessment of the actions by Alaska Airlines was headed 22 by Mr. Brad Pearson, who was the Flight Standards 23 regional director for the Northwest Mountain Region. 24 MEMBER GOGLIA: You mentioned the increased 25 staffing that has occurred there. Obviously you don't

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110

1 go from -- I think you said it was seven people at the 2 time of the accident?

3 MR. RODRIGUEZ: Yes, sir. It was less than
4 10. It was an odd number. It's either seven or nine.
5 I'm sorry, I can't bring it accurately.

6 MEMBER GOGLIA: That's okay. It doesn't 7 matter. And bringing that number up to 30+, that 8 doesn't happen overnight. What kind of time frames are 9 we looking at before they finally got up to their end 10 numbers?

MR. RODRIGUEZ: We did some interviews in November of 2001. That would be roughly a year and a half after the accident. I think at that time, it was basically the Certificate Management Office had been staffed out with the exception of an analyst to analyze all of the data that would be generated by the ATOS Program.

18 MEMBER GOGLIA: Okay. And given --19 MR. RODRIGUEZ: And there have been changes 20 in that since -- obviously since November of 2001. 21 MEMBER GOGLIA: And given, you know, if 22 they're up to snuff in manpower levels by then, by the 23 end of 2001, and then in the middle of 2002, this audit 24 team that's been in place for more than a year? 25 MR. RODRIGUEZ: Yes, sir.

1 MEMBER GOGLIA: Then comes to a consensus 2 agreement that they think that progress has been made 3 and the airline is going in the right direction, what's the value added of another high-level team going in and 4 5 looking at Alaska again, given the resource issues that 6 all of us in government have today? 7 Those people are going to come from somewhere. They're going to come off --8 9 MR. RODRIGUEZ: Yes, sir. 10 MEMBER GOGLIA: -- somebody else's 11 certificate. 12 MR. RODRIGUEZ: There are within the FAA, 13 there are agencies and offices that are designed to do 14 just that sort of thing, and it would simply mean that 15 rather than inspect a given carrier, they would use 16 those resources on Alaska, and it's a matter of 17 priority for higher than me to make that decision, but 18 if I was in charge, I'd look at Alaska. 19 MEMBER GOGLIA: Now, I'm not so sure that I 20 would agree with that because, you know, we only have a

finite number of people that know what they're doing, that understand the process, and where do you put them? I mean, after -- are we going to move people here and then have a problem pop up somewhere else that -- on another carrier that should have received an inspection

1 that didn't because we've diverted the resources to 2 satisfy us?

3 MR. RODRIGUEZ: As a matter of fact, Mr. Goglia, we did make a recommendation, I have it here 4 5 somewhere, in '96, 1996, based on the Tower Air 6 accident up at Kennedy, that the FAA apply resources to fast-growing carriers and that they focus on that 7 effort with the resources they do have. As a matter of 8 9 fact, that recommendation is still open, unacceptable, and I believe, let me check since it's here, they want 10 11 to -- and they have requested us to close it 12 acceptable.

My position is or my point would be that 13 14 Alaska was a rapidly-growing and aggressive operator. 15 They have introduced the 737-700, the 737-900. They 16 have the MD-80s still flying and, of course, the 17 generic 737-200s and -400s, and while their growth increased in terms of total numbers of aircraft, they 18 19 also have increased their aircraft daily utilization 20 significantly and -- well, I've said enough. That's my 21 position and I'll rest.

22 MEMBER GOGLIA: No, you won't. You'll come 23 back, I've got another question for you.

24 MR. RODRIGUEZ: Okay.

25 MEMBER GOGLIA: All right?

(Laughter)

1

2 MEMBER GOGLIA: Let's go to the other side of 3 it now. All right. We now have two major carriers in this country in bankruptcy. What should the FAA do 4 5 about that? Substantial reductions in personnel across 6 the board. Do they not need additional oversight as 7 well? 8 MR. RODRIGUEZ: Yes, I would say they do, and 9 \_\_\_ 10 MEMBER GOGLIA: So, should we take the 11 inspectors off of those and send them to Alaska? 12 MR. RODRIGUEZ: Well, --13 MEMBER GOGLIA: I mean, this is a dilemma 14 that everybody that has to make public service 15 management decisions on how to allocate their resources is faced with, and right now, we're faced with a very 16 17 troubled industry, and how do we divert six months 18 after the closing of a major audit, how do we justify 19 diverting those resources back to this carrier when 20 there are other areas that need to be looked at? MR. RODRIGUEZ: Well, for one thing, the 21 22 industry is several years down the road with respect to 23 the implementation of ATOS. Those other carriers that 24 you're referring to have had and I assume -- of course, 25 I have no direct knowledge, but they have surveillance

teams and a Certificate Management Office in place at 1 2 each place, and I assume that they have not rapidly 3 expanded in the recent past, but I don't know that because I don't know which ones you're referring to. 4 5 MEMBER GOGLIA: Expansion wasn't the issue. 6 It's the other way. You know, like this -- in a speech 7 recently by, I think it was Norm Mineta but it may not 8 have been, he talked about over 100,000 people from the airline industry that are now out of work as a result 9 10 of events of September 11th. Many of those people have 11 come from the maintenance and engineering community. 12 So, I think the entire industry needs watching now. The FAA does not have unlimited resources to 13 14 do the watching, and I think that that has to be a 15 concern of ours. I guess maybe not of staff but as the 16 Board, that's a concern of the Board. 17 All right. Thank you. 18 ACTING CHAIRMAN CARMODY: I certainly agree 19 with that, yes. 20 MR. CLARK: Madam Chairman, one thing along 21 that line is the last inspection that really got into 22 this area, I believe, was July of 2001 and that's a little more than a year and a half ago. 23 24 The other issue is that historically, we kind 25 of don't get in the FAA's business about trying to

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115

apportion how they have to conduct their business. 1 The real fundamental question here is, if these events and 2 3 issues give us an idea that there's a problem that needs to be looked at, I think we need to make it clear 4 5 and get that known and then the tough decisions have to 6 be made how to apportion that out and make the hard decisions, but if we don't make that known, it just 7 8 kind of goes away when there may be a problem there 9 lingering. So, I think if there's an issue there, we 10 need to outline the issue, and if the Board finds that 11 they don't believe there's an issue, then we need to 12 clean it off the books here for that reason.

13 ACTING CHAIRMAN CARMODY: No, you're right. 14 I was going to say something along those lines, except 15 I also agree very much with Member Goglia's over-16 arching concern about the industry, but I do understand 17 the staff is raising this issue because of this 18 accident and because of the work they've done and we 19 value that. We'll have to make our judgment as to 20 whether that's the way to go or not, and the resource 21 allocation issue is a huge one, not just for us but 22 really for the FAA, and we can't solve that today, but 23 I take your point.

24 Member Black, any questions?

25 MEMBER BLACK: Just a couple. I would submit

that I suspect that there's at least one or two people 1 2 here from the FAA and they might have even got the 3 message that way. So, the report itself, I think, will speak for itself when it's finished with regard to what 4 5 we think. It's not that I disagree or agree one way or 6 another with it, but I definitely think that I'm a 7 great believer in on-going oversight. Let's put it 8 that way.

9 Speaking of that, something that is not in 10 the report that would add into this history of 11 oversight at the FAA is while this -- I could not help 12 but observe that while this airplane, the accident 13 airplane was going through its route through the 14 inspections and that sort of thing, it's next-to-the-15 last C check, wasn't there a fairly in-depth 16 investigation going on in 1998 at the criminal level by 17 the FAA and the FBI of maintenance irregularities at Alaska? 18

19 MR. RODRIGUEZ: Yes, sir.

20 MEMBER BLACK: So, that was actually going on 21 while this airplane was still flying before the 22 accident occurred, and they were looking at things at 23 that point in time in-depth.

24 MR. RODRIGUEZ: Yes, sir. As a matter of 25 fact, I believe it began in and about the time it was

1 going through the C check.

2	MEMBER BLACK: Okay. That's just a point
3	that I'm not real sure what it means. I guess you
4	would think that some of these things, you would think
5	that that would certainly create certainly when the
6	FBI was around, it would have created a high level of
7	tension on me if I had been there, and I can't help but
8	wonder why that didn't have some effect on this process
9	and that's more of an observation than it is a I do
10	think it might be worthy of noting that in the report
11	somewhere because if it's in there, I didn't see it,
12	that there was actually on-going in-depth investigatory
13	work during this process. Is it in there, Karen? I
14	missed it then. I'm sorry.
14 15	missed it then. I'm sorry. MR. CLARK: 175.
	-
15	MR. CLARK: 175.
15 16	MR. CLARK: 175. MEMBER BLACK: Okay. Thank you.
15 16 17	MR. CLARK: 175. MEMBER BLACK: Okay. Thank you. ACTING CHAIRMAN CARMODY: Was that it, Member
15 16 17 18	MR. CLARK: 175. MEMBER BLACK: Okay. Thank you. ACTING CHAIRMAN CARMODY: Was that it, Member Black? Okay.
15 16 17 18 19	MR. CLARK: 175. MEMBER BLACK: Okay. Thank you. ACTING CHAIRMAN CARMODY: Was that it, Member Black? Okay. Member Hammerschmidt?
15 16 17 18 19 20	MR. CLARK: 175. MEMBER BLACK: Okay. Thank you. ACTING CHAIRMAN CARMODY: Was that it, Member Black? Okay. Member Hammerschmidt? MEMBER HAMMERSCHMIDT: Mr. Rodriguez made
15 16 17 18 19 20 21	MR. CLARK: 175. MEMBER BLACK: Okay. Thank you. ACTING CHAIRMAN CARMODY: Was that it, Member Black? Okay. Member Hammerschmidt? MEMBER HAMMERSCHMIDT: Mr. Rodriguez made reference to the ATOS Program, and we delved into that
15 16 17 18 19 20 21 22	MR. CLARK: 175. MEMBER BLACK: Okay. Thank you. ACTING CHAIRMAN CARMODY: Was that it, Member Black? Okay. Member Hammerschmidt? MEMBER HAMMERSCHMIDT: Mr. Rodriguez made reference to the ATOS Program, and we delved into that quite a bit in the public hearing, as I can recollect.
15 16 17 18 19 20 21 22 23	MR. CLARK: 175. MEMBER BLACK: Okay. Thank you. ACTING CHAIRMAN CARMODY: Was that it, Member Black? Okay. Member Hammerschmidt? MEMBER HAMMERSCHMIDT: Mr. Rodriguez made reference to the ATOS Program, and we delved into that quite a bit in the public hearing, as I can recollect. The Air Transportation Oversight System.

1 accident experienced by Alaska Airlines?

MR. RODRIGUEZ: The folks at the Certificate 2 3 Management Office in Seattle told us that it was very disruptive, that they were trying to -- first of all, 4 5 they lost control of their geographic inspectors who 6 had been working with them at other sites, and that 7 they had no -- while they had some training, there was an awful lot of language to learn and concepts to 8 understand, and I think the PMI who retired, as I 9 10 mentioned, in '99, made the point that there had been 11 virtually no surveillance because of that. They were 12 too busy developing their safety attributes and 13 elements and that sort of thing. They were doing the 14 administrative work and nobody was out pounding the 15 beat, so to speak. 16 MEMBER HAMMERSCHMIDT: Right. Because of 17 this transitional --18 MR. RODRIGUEZ: Yes, sir. 19 MEMBER HAMMERSCHMIDT: -- stage --20 MR. RODRIGUEZ: Yes, sir. 21 MEMBER HAMMERSCHMIDT: -- from the PTRS 22 System? 23 MR. RODRIGUEZ: Yes, sir. 24 MEMBER HAMMERSCHMIDT: Program Tracking and 25 Reporting System to the ATOS System.

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119

1 MR. RODRIGUEZ: And in fact, after the 2 accident, at Alaska, in order to facilitate inspection 3 and surveillance, they did generate a hybrid program 4 wherein they were using the PTRS System as well as ATOS 5 simultaneously during this period while they spooled up 6 the staffing of the office.

MEMBER HAMMERSCHMIDT: Well, I had seen what 7 you had included in the factual portion of the report 8 in this regard, even guoted, I believe, what the PMI 9 10 who had recently retired, actually in November '99, 11 what he had said at the public hearing and I 12 highlighted just a couple of sentences out of this two-13 thirds of a page quotation. It would be on Page 156, 14 but the parts I've highlighted of what he had testified 15 to was, "None of us were -- we were too caught up doing 16 ATOS things to actually go out and do any surveillance, do the system evaluations." And then, the last 17 18 sentence that we quote in this passage has the PMI stating, "Nobody was out there looking at the carrier." 19 20 So, when you mention ATOS, I just wanted to

21 insert that bit of information that was gleaned at the 22 public hearing.

23 So, that's all I had.

ACTING CHAIRMAN CARMODY: Member Goglia, you had a question about a date, I believe.

1 MEMBER GOGLIA: Yes. Mr. Guzzetti or maybe 2 it's Rod, we talked about the rudder bearing failures 3 that came to light.

4 MR. RODRIGUEZ: Yes.

5 MEMBER GOGLIA: Do we know the date that 6 those were last lubed? They don't fall apart 7 overnight, it takes some time.

8 MR. RODRIGUEZ: I don't have the specific 9 lube, sir. The best I got was six months previous 10 because the initial notification we got was that they 11 had both recently been lubed almost, you know, within 12 the week or two weeks, and we got a letter from Alaska Airlines advising us that that was inaccurate 13 14 information, that the one had been six months out of 15 the lubrication cycle and the other was due for the 16 lubrication cycle within a month or two. That's the 17 closest -- I mean, there was no specific dates given. 18 MEMBER GOGLIA: And what was the cycle? I meant, I was trying to deduce it as you were talking. 19 20 It's six months out and we lube -- are they on a six-21 month lube cycle for that, those bearings? MR. RODRIGUEZ: I don't know what the lube 2.2

23 cycle is for the rudder.

24 MEMBER GOGLIA: Jeff is frantically trying to
25 read something.

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121

MR. GUZZETTI: Yes. Okay. I think it's
 every C check.

3 MEMBER GOGLIA: So, that's not six months, 4 that's --

5 MR. GUZZETTI: Well, no. I take that back. 6 MR. RODRIGUEZ: Well, C check would be 15 7 months. So, it was -- the one was at 13 months, the 8 other was six months out of the C -- it had passed the 9 C check six months previously.

10 MR. GUZZETTI: It says here, Member Goglia, 11 on April 23rd, 2002, Alaska's Reliability Program 12 identified a concern with the rudder trim tab hinge 13 support bearings. The wrap work concluded that the 14 current C check lube interval adequately addressed the 15 lube procedures. The Board recommended that the 16 issuance of a maintenance information letter 17 emphasizing the proper lubrication be issued, and then in September 23rd, 2002, the VP of Maintenance and 18 19 Engineering directed the issue to be reopened for 20 additional analysis. The result is Alaska submitting a 21 wrap control board directive reducing the rudder trim 2.2 tab lube interval from the current C check, which was 23 approximately 4,350, to the Boeing MSG-2 OAMP low-end interval of 1,200 flight hours. Alaska initiated a 24 25 fleetwide campaign on all of its MD-80 series airplanes

1 to inspect and lube the rudder. The campaign was 2 completed on September 25th, 2002, with no additional 3 bearing failures noted.

4 And then, it also indicates that prior to 5 September 19th, 2002, the Alaska Airlines CMO, FAA CMO 6 had no knowledge of the lube issues surrounding the rudder trim tab hinge bearing supports. 7 Upon 8 notification, the FAA requested all pertinent 9 information, and their conclusion is on September 27th, 10 2002, the VP directed a decrease in the lube intervals 11 to 1,200 hours and the CMO will continue to monitor and 12 take action, if appropriate. MEMBER GOGLIA: Okay. Thank you. 13 14 ACTING CHAIRMAN CARMODY: I think in light of 15 the hour, why don't we take a lunch break at this point and come back at quarter of 2 and resume? 16 17 (Whereupon, at 12:43 p.m., the meeting was 18 recessed for lunch, to reconvene this same day, 19 Tuesday, December 10th, 2002, at 1:45 p.m.) 20 21

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  - 23 24
  - 25

1 2 AFTERNOON SESSION 3 1:49 p.m. ACTING CHAIRMAN CARMODY: Where is John? I'd 4 5 like to get started because we have a lot to cover this 6 afternoon. So, please come in if you're in the back or 7 if not, close the door. I think people are filtering 8 in slowly. 9 Yes, let's resume. Mr. Rodriguez, will you 10 -- had you completed your presentation or you had some 11 more to go? 12 MR. RODRIGUEZ: I believe we were in the 13 question and answer session. 14 ACTING CHAIRMAN CARMODY: No. We had 15 finished on that, but I wasn't quite clear if you had 16 finished all of the section on FAA Oversight or if that was still to come. 17 MR. RODRIGUEZ: Okay. I have -- no, I have 18 19 no other prepared statements on the FAA. 20 ACTING CHAIRMAN CARMODY: All right. 21 MR. RODRIGUEZ: It's still, as I said, 22 questions and answers --23 ACTING CHAIRMAN CARMODY: Okay. 24 MR. RODRIGUEZ: -- on the two subjects, 25 either subject.

ACTING CHAIRMAN CARMODY: All right. 1 I think 2 we have covered those then, and we're ready to go on to 3 the next area which is Design and Certification. 4 MR. RODRIGUEZ: Yes, ma'am. 5 ACTING CHAIRMAN CARMODY: We had started that 6 briefly earlier. 7 MR. RODRIGUEZ: Mr. John Clark, Director, Office of Aviation Safety, will summarize the staff 8 considerations on issues surrounding design and 9 10 certification of the MD-80 horizontal stabilizer 11 jackscrew assembly. 12 ACTING CHAIRMAN CARMODY: Please go ahead. 13 MR. CLARK: Madam Chairman, Members. 14 I briefly mentioned a little earlier about 15 the three recommendations that we drafted to deal with the design and certification issues that we see, and 16 17 the first one was to eliminate the catastrophic effects of the thread loss. The second one was to address new 18 19 designs coming out so that that issue isn't on the 20 table in new designs, and the third was to assure that 21 the wear process was addressed in either the system 22 structure, system safety part of the design. 23 So, what I wanted to make clear was that when 24 we raised this design and certification issue and we're 25 not trying to minimize the importance of this

maintenance inspection failure that we see going on 1 2 here. That's extremely important in this accident 3 investigation. What we're trying to do is to improve safety margins by suggesting the use of some practical 4 5 design alternatives that could eliminate the 6 catastrophic effects of the acme nut wear rather than 7 relying solely on the inspection process to prevent the 8 excessive wear.

9 There's several key reasons to consider 10 design enhancements. The wear failure of the acme nut 11 should be recognized as a single catastrophic-type 12 failure. That means it should fall under the design requirements that state the probability of a single 13 14 point catastrophic failure should be less than 10 to the minus 9th. Conversely, that means that you should 15 16 be able to fly to 10 to the 9th hours, a billion hours, 17 without this type of failure in a particular design of 18 airplane.

Wear was not considered a failure mode during this design as such, and we now have about 100 million hours on this particular design. To reach this 10 to the minus 9th level, we need to fly these hours by a factor of 10 more. We're at one-tenth of this socalled 10 to the minus 9th. Some staff believe that we can achieve this safe service life, this nine times

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126

more flying hours, through the maintenance route and some of us aren't convinced of that and that's our big concern.

To put this in perspective, I believe the entire transport fleet right now has about 500 million flight hours or about a half of this 10 to the minus 9th, and we're dealing with a subset of the entire fleet right now at a 100 million hours.

9 When dealing with fatigue, for example, we 10 require highly-controllable processes in engineering, 11 manufacturing, inspection and training. These 12 lubrication and measurement processes right now on this 13 jackscrew arrangement are not considered highly-14 controllable events, and I think that's shown by Dr. 15 Price's study. An acceptable position in the quality 16 discipline -- the quality discipline out there kind of 17 accepts the position that inspection is 80-percent effective at best. We don't have control over 18 19 contamination of training either, and it appears that 20 Alaska may still be struggling with their procedures 21 and training regarding lubrication and end-play 2.2 measurements.

In addition, and this is an important one, we have no direct measure of wear right now. We have an indirect measure with this jackscrew arrangement.

We're looking inside. We're wiggling the jackscrew and that we consider an indirect measure, not a direct measure, of wear.

4 The other issue that we have is that we 5 consider the mechanic and maintenance operation in the 6 United States to be first-class, but we're also dealing 7 with a global issue. We're worried about what goes on out in the rest of the world, and there are operations 8 out there that aren't as fortunate as us to have the 9 10 kind of skilled people we have working in the 11 maintenance operations.

12 Regarding wear of the acme nut, we have not 13 seen the data that assures us this design could meet a 14 10 to the minus 9th type of requirement relying on 15 improved maintenance procedures. How do we generate these numbers that show we can rely on maintenance? 16 17 I'm not sure. We've noted the issues raised in Dr. 18 Price's study. There's concern there. Further, we 19 don't know all the potential failure modes. We're not sure what those are. We can look at this failure mode 20 21 and perhaps we can address it directly, but that 2.2 doesn't assure us that there aren't other mechanisms. 23 For example, the grit and the wear that came in on the Hawaiian Airlines was kind of unknown to us. 24 It was out of the blue. So, that was a second type. 25

1 Further, an FAA expert testified at our 2 hearing that wear is so complex, that we cannot conduct 3 a statistical analysis of it for system safety. Basically, if you can't put a number to that, that 4 5 almost -- that comment almost singlehandedly takes this 6 10 to the minus 9th issue off the table. If you can't get that kind of number, you can't really rely on the 7 8 10 to the minus 9th.

9 We think we have two ways to go. We can 10 either develop a better understanding of all of the 11 risks associated with the wear and rely on maintenance 12 intervention or another way is to add margin on top of 13 that and remove or mitigate the problem through a 14 design based on the assumption that the acme nut will 15 wear to failure. Now, when you put those designs in place, we don't want -- we never want it to wear to 16 17 failure. We want everything working on the maintenance 18 and design side, but as that last back-up on this 10 to 19 the minus 9th issue, we want that there as a safety 20 margin.

To solve this single failure or single point failure issue, there's -- we perceive potential types of design changes out there. There's been a number of them bandied about. There can be some design changes or modifications perhaps to capture the jackscrew in

the event that the nut fails, stabilize the situation. 1 We believe the airplane could land if the stabilizer 2 3 quit working and that's happened before or possibly having some sort of active monitoring system. 4 There's 5 been suggestion that if we could get back there and 6 look at a monitoring system once every flight, once 7 every 10 flights, that would buy us that margin of 8 safety that we really need.

9 For example, airplane brakes have wear pins 10 on them that the crews can walk around and check before 11 every flight. You can see if a brake has worn down or 12 is wearing excessively. When that pin disappears from 13 sight, you know it's not supposed to take off and fix 14 the problem.

15 Now, the -- we recognize this is a tough 16 issue, and here at staff level, we've had some really 17 spirited discussions about some of the pros and cons of 18 it, and I know the Board's equally concerned for lots 19 of good reasons. The one thing I want to assure you is 20 we don't want to be excessive in our recommendations, but on the other hand, we don't want to come up short 21 either because this -- we're at this 100 million hours 22 and it's a long, long time before we'll see that 23 ninefold increase in our flying hours. 24

25 So, that's kind of a good overview of a lot

of our views. With all the spirited discussions, staff certainly are welcome to jump in and offer different views, if they choose, but basically I think we can try to answer any questions the Board may have.

5 ACTING CHAIRMAN CARMODY: Thank you, Mr. 6 Clark. That was an intelligent discussion of the 7 problem that's on all of our minds.

8 I guess from what you said, it's safe to say 9 that you would view this design change and modification 10 as another arrow in the quiver really of preventive 11 things to increase the level of safety. Certainly it's 12 not the only solution. It's a piece of a larger --

13 MR. CLARK: It can be that. It can be 14 something that just simply takes that issue off the 15 table, and we're looking for a practicable way to achieve that. We don't -- we're not looking for major 16 redesign of the system, you know, going out and putting 17 18 two jackscrews on or anything like that. Something 19 that's simple, effective, and, you know, appropriate 20 for just taking that edge off the risk.

ACTING CHAIRMAN CARMODY: That was going to my next question. How simple are these modifications? Do we have a sense of if they are truly simple ones? I appreciate your saying you don't want to redesign or add another jackscrew, but do we have a sense that this

1 is simple to do or not?

MR. CLARK: Well, since we haven't done it, 2 3 it's always easy for us to sit there and declare that it's really simple. On the other hand, we have a lot 4 5 of confidence that -- I mean, there's a lot of smart 6 engineers out there that are very clever and can find 7 effective ways to take the edge off and that's what 8 we're -- we have confidence in. 9 There's been some designs about -- talking 10 about followers on the jackscrew. The threads wear 11 out. The followers simply engages the jackscrew, stops 12 it where it is, and NASA has a certain number of 13 designs like that on some of their applications. 14 That's just an idea, but in a sense, it seems that it 15 could be reasonably simple, reasonably effective, but 16 again until you really get in and start trying to do 17 the design, you never know for sure. 18 I would suggest that as we have gone through 19 these types of issues in the past, it always amazes us 20 how clever and good the engineers are to solve problems 21 like this. 22 ACTING CHAIRMAN CARMODY: I may come back, but let me move on to Member Hammerschmidt. Any 23

24 questions?

25 MEMBER HAMMERSCHMIDT: Well, first a comment.

Just yesterday actually, I was made aware of some information about what they've been doing down at the Kennedy Space Center on their jackscrews. They have several hundred that they have been trying to increase the safety of.

6 Is the staff thoroughly familiar with the 7 work that's been done down there?

8 MR. CLARK: I would say thoroughly familiar, I'm not, or we're aware of it. We're aware of some of 9 10 the design concepts. We've read the literature. We 11 did, Jeff and -- I think Jeff and somebody else went up to Nook Industries, who's a leading manufacturer of 12 13 acme screws and nuts, and received a lot of good advice 14 from them, but we're aware of what NASA's done. We're 15 aware of the literature and the patents, but as far as 16 getting into the specifics of the design, no, we did 17 not.

MEMBER HAMMERSCHMIDT: Okay. So, you
wouldn't have a sense of whether or not their concept
or their approach would be possibly transferrable to
the DC-9 series of aircraft?

MR. CLARK: Oh, I think the concept is -seems to fit. Now, if there are problems or issues that we're not in business of designing jackscrews that would crop up to render that unusable, I'm not aware of

1 it, but the design and the concept and the purpose for 2 which they designed it is the exact same one we have 3 here.

MEMBER HAMMERSCHMIDT: Right, right. Well, I
found this information, like I say, which I only became
aware of yesterday, including, just for reference,
something called a Technical Support Package, failsafe, continued to operate concept for jackscrews, NASA
Tech Briefs, KSC-12187/291/92.

MR. CLARK: I received a letter yesterday from one of the family groups or -- and we appreciate that. It had been provided to us earlier and it made a lot of sense, but in the process of us going down there to try to junior engineer the process, we didn't do that.

MEMBER HAMMERSCHMIDT: Well, of course. 16 17 Right. I was just thinking as I looked at this information that it would seem almost to be useful in a 18 19 report such as this Alaska Airlines report, at least in 20 some reference or footnote or something along those 21 lines. I don't know what staff has to say on that. We 22 make reference to it in a generic way in the concepts, 23 like you've already described in your presentation. But it just seemed to be just highly interesting. 24 25 MR. CLARK: Well, I believe it is. It's --

we try to be a little cautious if we really haven't done as much of a goodness check as we can before we endorse some product. I think it's perfectly appropriate and perhaps, you know, we can refer to that type of activity that NASA is very active in it, and that there may be various applications to buy ourselves a little --

8 MEMBER HAMMERSCHMIDT: That's what I mean. 9 MR. CLARK: -- qualifier. Certainly not an 10 endorsement.

11 MEMBER HAMMERSCHMIDT: Yeah. Okay. Mr. 12 Guzzetti, you've been involved in this issue for many 13 months now. What are your thoughts on this single-14 point failure approach?

MR. GUZZETTI: Well, first, let me state that I fully understand and respect both sides of the issue. It's certainly a tough issue, and Mr. Clark has articulated both sides pretty well.

Notwithstanding the fact that he's my boss, I
would have to agree -- disagree in certain areas of
some of the recommendations and a few of the analyses
that have been made.

I don't think it's a simple fix. I don't know enough yet or I don't think anyone's studied that well enough yet, but my intuition tells me it's not as

simple as it sounds, putting a follow-on nut on there or, for example, the KSC document that you referred to. That mechanism, we have reviewed it, not in-depth, but that mechanism is vertically mounted, not horizontally mounted. It involves the nut moving and translating, not the jackscrew, and I'm not so sure you can just take that concept and apply it to the DC-9 MD-80.

8 That being said, I would think that if I knew 9 that none of these recommendations we've made and are 10 proposing regarding maintenance, if I knew that none of 11 those or some of them were not going to be 12 incorporated, then I'd be all for a modification of the jackscrew design, but I think there's a compelling case 13 14 that needs to be made regarding maintenance 15 intervention, lubrication and inspection, that if you tighten up those intervals and prove the reliability 16 17 and validity of the end-play check or go with some other type of check that does involve direct measure of 18 19 the jackscrew, I think it's a tough sell to burden 20 carriers and to burden a manufacturer with what I 21 believe could be a very, very expensive drain of 22 resources, both in human attention, financial considerations, time involved, and perhaps those issues 23 could be better left to concentrate on some of the 24 25 other heavy hitters of what's causing accidents today,

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136

like runway incursions and fatigue and inerting fuel
 tanks.

3 So, it's really a tough call because I think that if we're going to ask the FAA to require the 4 5 manufacturer to come up with a design modification and 6 then require that that modification be incorporated in well over a thousand airplanes flying in the U.S. and 7 maybe another thousand worldwide, that's a fairly 8 significant action on the scale of the 737 rudder PCU, 9 10 and if you're going to base that on the Alaska Airlines 11 accident in which we -- at least I'm fairly confident 12 we've nailed it in terms of the fact that it's an inadequate lubrication issue, it's a maintenance issue, 13 14 it's a procedural issue, interval issue, you plug the 15 holes, then that would get at the fact that this very robust design should never wear down given those 16 17 increased frequencies.

So, those are just some of the concerns that 18 19 I'm just not -- after being immersed in this I have. 20 for three years, I've really done a lot of soul 21 searching, and I'm just not entirely comfortable with 22 -- I have to go pick a side of the fence I'm going to sit on and I'm going to sit on the fence that is to 23 give maintenance a chance before you alter the design. 24 25 That being said, I don't think this jackscrew

would meet a 10 to the minus 9 criteria. I agree with 1 2 that. I can't argue with that. However, it's been a 3 work horse for going on 40 years now, and the 10 to the minus 9 criteria wasn't in place back then, and I think 4 5 we need to give some credit to this design that has 6 served the airplane well, except for this one accident, in which there were some pretty clear failures of 7 processes that occurred to get there. So, that's my 8 9 take on it.

10 MEMBER HAMMERSCHMIDT: Okay. Well, that's a 11 very good answer. Very complete. Of course, we're 12 talking about not only civilian aircraft but military 13 aircraft as well.

MR. GUZZETTI: That's correct. The Navy andthe Air Force operates these airplanes.

MEMBER HAMMERSCHMIDT: Hm-hmm. And I've heard your thoughts echoed by others in our Office of Aviation Safety as well, just for reference.

Well, thank you. That's all I have for rightnow.

ACTING CHAIRMAN CARMODY: Member Goglia?
MEMBER GOGLIA: I have a few questions.
Mr. Clark, I'm trying to figure out which
order to put these in. Let's do this. At what point
as a design -- aircraft design engineer, which you were

1 one once, at what point does the designer have a right 2 to rely upon the maintenance program to provide him the 3 necessary support for his design so it can maintain its 4 service life, design life?

5 MR. CLARK: Well, my prior life at the 6 manufacturer, I really wasn't a design engineer and 7 never got into that end of it. The issue, when should 8 they -- where should they draw the line and say the 9 maintenance is going to take care of everything? I 10 think that that -- let me back up a little bit.

Jeff commented that this 10 the minus 9th issue wasn't a concept back when this airplane was designed, but it's not unfair to go back and look at it in that light and that's what we're doing. We're second-guessing a lot of people.

I think that what we try to look at is that if something is going to be catastrophic, can we buy margin or mitigate the effects, just simply make the assumption that something's going to be catastrophic and mitigate it or put the infrastructure in place where it makes it very, very difficult for that thing to occur?

The problems we have are like with highrotating -- high-energy rotating parts out of engines.
Very high energies. If the fan disk or the high-

pressure turbines on these jet engines let go, they're 1 2 coming through whatever is in the way. They'll cut a 3 wing off. They'll take the -- do serious damage, like 4 we had up at Sioux City. We don't know of any way as a 5 designer to contain it once it lets go. So, there's a 6 huge amount of infrastructure in place to -- we go through the design. We go through double melts, triple 7 8 melts on the titanium, very extensive inspection techniques. I know you've talked to me about what ones 9 10 work out there and which ones don't.

11 We need that kind of infrastructure in place 12 on something that can be catastrophic. So, where does 13 the design come in? I would look at it as if you can 14 size it up, if that thing -- if you assume that that 15 failure occurs and it can be catastrophic, then we need 16 to apply the 10 to the minus 9th. Now, is it fair to 17 go back retroactively? I think it is in a sense. Not 18 to criticize the design in and of itself, but what can 19 we -- let's look at it, and if we can't get to that 10 20 to the minus 9th, then we can see what we can do.

Right now, to add on, retrofit, look at the design, mitigate it the best we can, and if we're not going to do that, if we can't do that, then we need to put a very extensive infrastructure in place on these critical items just to make sure, a hundred percent

1 sure that they're very, very carefully controlled.

What I might point out, one of the options, 2 3 you know, for the amount of -- let's talk about the 4 amount of infrastructure that it takes to keep a fan 5 disk running, the design, maintenance, very complicated 6 stuff, costs a lot of money. If there with an 7 inexpensive way to contain that, you may not have to put as much attention to doing that. So, we have a 8 balance there, also, in this particular thing with this 9 10 jackscrew, is do we want to have very rigorous, very 11 repeatable low-hour-type maintenance, 2,000, 1,000 12 hours, or 600 hour lubes, just repetitive, and with 13 much more stringent training in process, or can we -- a 14 lot of ADs that go out have -- you have to do 15 repetitive inspections until there's some terminating 16 action. When you take the terminating action, some 17 sort of design change or you switch part or piece or 18 something like that, then it takes away the burden of 19 doing very extensive maintenance issues. So, that's a consideration, also, here. 20

21 MEMBER GOGLIA: Okay. Mr. Guzzetti, you 22 mentioned just before lunch about American Airlines and 23 the wear rates and their grease cycles. What did you 24 say was their grease program?

25 MR. GUZZETTI: I believe they were

lubricating their jackscrews every 940 flight hours, 1 was, I think, the second smallest, lowest interval in 2 3 the industry. 4 MEMBER GOGLIA: And that's roughly three 5 times the initial DC-9 interval, 300 --6 MR. GUZZETTI: No, it was -- yes. On the 7 specification. 8 MEMBER GOGLIA: Right. 9 MR. GUZZETTI: But when --MEMBER GOGLIA: And then it went to 400 which 10 11 would be double. 12 MR. GUZZETTI: It went to 600 to 900 when it rolled out the door, the DC-9, and these are -- and 13 14 then when American started getting MD-80s, they were 15 still lubing at the 940-hour interval, even though the 16 MSG MRB Program escalated it up to 3,600. 17 MEMBER GOGLIA: Okay. And you mentioned that 18 there was virtually no wear in their jackscrews because 19 of that? 20 MR. GUZZETTI: That's correct. 21 MEMBER GOGLIA: All right. I guess I would 22 go back to Mr. Clark since you're the 10th to the minus 23 9th guru there. If we have virtually no wear on a jackscrew because we lubricate it, would that then make 24 the 10th to the minus 9th? 25

1 MR. CLARK: I don't think we know. The --2 will it always make that? Can we go out there for that 3 period of time and never have a maintenance failure 4 that allows lubrication? Can we get -- we know we had 5 a contaminant get in on the Hawaiian Air and give us a 6 13 time. Is that the worse contaminant we can get in there that can give us problems between these 2,000-7 hour maintenance cycles? Those are things that concern 8 9 us and it's the thing that we don't know that we're --10 that kind of keeps that open. I don't know how to 11 answer that.

12 What I said earlier was that for this 13 specific issue and this specific lubrication, would it 14 appear that we've solved the problem by more 15 lubrication rates? In a sense. But there's things, also, we don't know. For example, if I did miss one of 16 17 those lubrications and for whatever mechanism I got 18 into a high wear rate, what we don't know that if we 19 relube that jackscrew or we -- will that self-heal 20 itself and go back to a normal wear rate? Those are 21 the kind of things we don't know.

If we want to look at how this thing got to 40,000ths, could it be that back at 10,000 hours, the lubrication was missed and we had a small section of a high wear rate and then it went away? It's the unknown

that's worrisome, and if you can just simply take the 1 2 argument off the table, you don't have to worry about 3 the unknown, but I also recognize we do rely on standard practices, but most of those don't lead us to 4 5 this type of catastrophic failure and that's -- so, I 6 think that puts this thing in a class that there are 7 very few parts and pieces that really fall right in 8 that area.

9 MEMBER GOGLIA: As I listened to you explain 10 that, I got thinking about Aloha and the accident, and 11 why didn't we recommend double hulls like we do on 12 tankers?

MR. CLARK: I don't think that would be practicable. I don't -- I wouldn't know how to do that. I wouldn't know how to contain a fan disk. Those, we have to handle other ways.

MEMBER GOGLIA: And what about bi-planes? Do you think we should go back to bi-planes, so we can have redundant wings?

20 MR. CLARK: No.

21 MEMBER GOGLIA: That's what comes to mind.
22 It's a no-win situation.

23 MR. CLARK: It's a tough situation.

24 MEMBER GOGLIA: Okay. I will pass it on to 25 Member Black.

1

MEMBER BLACK: Thank you.

2 A couple of questions. John, you shared with 3 me a systems safety analysis fault tree which I can't 4 find right now, by the way. 5 MR. CLARK: Okay. 6 MEMBER BLACK: That's okay. I didn't 7 understand it anyway. But the -- something that comes 8 to mind and one of the things that we're talking about with Dr. Price earlier about certainties here. We're 9 10 putting an awful lot of confidence in this number of 10 11 to the minus 9, and I often wonder what the error band 12 is for the 10 to the minus 9. I mean, somebody 13 selected somewhere along the line. It's my 14 understanding from ValuJet or some other accident that 15 we found that that was a pretty arbitrary selection 16 when the FAA was asked to define extremely improbable, 17 somehow they came up with 10 to the minus 9. 18 I'm just saying that I think we're dealing in 19 things here that are not well-established numbers. Are 20 we going to have 10 to the minus 9? 21 MR. CLARK: Ms. Schultz is our expert on 2.2 that. 23 MEMBER BLACK: Okay. 24 MR. CLARK: Ms. Schultz is our expert on that 10 to the minus 9th. She has -- comes with a systems 25

safety background. 1

2 MEMBER BLACK: Okay. 3 MR. CLARK: But I'd just make one comment. There's -- we worked a number of accidents where some 4 5 of those parts and pieces should have made it to 10 to 6 the minus 9th and they don't, and, I mean, there's some, I can't recall off the top of my head, but we 7 dealt with it in prior accidents. But for the origin 8 9 of 10 to the minus 9th. 10 MEMBER BLACK: Okay. 11 MS. SCHULTZ: Good afternoon, Member Black. 12 Just to answer your question, it is a 13 somewhat arbitrary number, and it's currently a number 14 that presides in the Federal Aviation Regulations, and 15 it's a number that's used to assess systems and their 16 ability to comply with the safety standards during 17 certification, and the real issue here that we were 18 looking at was the single-point failure nature, that 19 this nut itself could be considered a single item whose 20 failure surely in almost every circumstances, we 21 believe we see it, would result in a catastrophic 22 event, and we as a group looked at current aircraft and we failed to really see many situations where one 23 24 single component fails. 25

Member Goglia mentioned the wings and that's

a very astute difficult discussion, but even in those circumstances from my understanding, and I don't have a lot of background in structures, but that the loadbearing capability, which is the function that the wing provides, is redundant. There are dual load paths through the wing, and so it's a difficult question, how far do you go?

8 MEMBER BLACK: Okay. Thank you. The best 9 explanation I've heard. I still think they guess but 10 okay.

There's also the issue here that we haven't 11 12 addressed. Thank you. There's also the issue again here that we haven't directly addressed that we worried 13 14 about in the USAir 427 accident in Pittsburgh, is first do no harm. In other words, you have a system that has 15 performed perfectly, I guess, for lack of a better word 16 17 for nearly a hundred million fleet hours at the time of the accident. You don't want to mess with it and 18 19 create something by some other device design to make it 20 fail-safe which will cause another problem, and of 21 course, that's up to the manufacturers, if we make a 22 recommendation and the FAA chooses to implement that recommendation, but I -- what I'm saying is we're sort 23 24 of in the pseudoscience here about saying very large 25 numbers.

1 If we were talking about an airplane that only had a few hundred thousand fleet hours, this would 2 3 be a very different discussion, but in this particular one with a very large number of airplanes in the fleet 4 5 and no previous failures, it becomes a different issue, 6 and I think that's what the board members are 7 struggling here with and what Jeff Guzzetti is trying to say, also, and I'm inclined to agree with him, that 8 9 this process is before you go changing a system which 10 has performed well, as we did in the 737s, we want to 11 make sure that we have some issue, and of course, in 12 the 737s, we had three or four incidents that led us 13 down that path, and we don't have that here, and we 14 certainly don't want that to happen.

15 There are other -- are there -- John, can you 16 think of systems in the airplane that single-failure 17 catastrophic systems, if a maintenance technician 18 failed a certain operation?

MR. CLARK: There's a -- I assume there's a number in the sense that anything that's going to give you loss of control on approach or it was suggested to me that, you know, losing a flap on approach, put the flaps out and somewhere close to the ground, you lose a flap, you're going to be in a very oximetric lift condition, that can happen. We talked about the --

even right now in the 737 rudder hard-over situation, 1 that there's a certain altitude below which, if we do 2 3 have a hard-over, the pressure has to come up to handle 4 the engine thrust. If we have a hard-over in those 5 conditions, we're still going to lose an airplane, and 6 again those are some of the decisions that are made and 7 evaluated at -- it's cutting the risk in the sense that 8 we -- at least we haven't eliminated it until they possibly go to the new design with redundancy built in, 9 10 but it has a -- it's at least cut it down to for every 11 flight to the first thousand feet up and the last 12 thousand feet getting down and getting down below some 13 sort of controllable speed.

14 MEMBER BLACK: Well, I can't help but think 15 when I was reading this for the first time, I thought 16 about the Aloha accident, also, which is, for those who 17 don't know what it is, it's the airplane that lost its 18 crown skin most of the way back, a 737, in Hawaii a 19 number of years ago, and the pilot somewhat 20 miraculously got it on the ground with only one 21 fatality, and I guess I would -- and I don't know what 22 the inspections are on 737s, but I guess I'd argue that someone was supposed to look at that seam probably the 23 24 last time it was inspected and they didn't catch it, 25 and it was almost a catastrophic incident. So, that in

essence by your definition, it almost sounds like a single-point failure.

3 MR. CLARK: From what I know about that, in 4 the sense that once the cracks lined up, it certainly 5 did become a single event, unzipped the top. It wasn't 6 catastrophic. Of course, we're dealing with one that's 7 very potentially that case over in Taiwan right now in 8 China Air 611 that came apart in flight and lost 9 everybody on board.

MEMBER BLACK: And there's some maintenance management. They don't have a cause for that accident yet, but there's some suspicions of maintenance management and maintenance practices on that airplane. MR. CLARK: Yeah. We have to defer to Dr. Young over at Taiwan right now. He's the guy that's going to make the call on what it was, --

17 MEMBER BLACK: I understand.

18 MR. CLARK: -- but we did find some 19 maintenance -- poorly-performed maintenance 20 years 20 ago that there were some big cracks there. Now, 21 whether those are the right cracks that got this 22 airplane down.

23 MEMBER BLACK: We don't need to get into 24 that. I'm just saying that there -- any time anyone 25 touches an airplane, and I used to be an aircraft

maintenance officer and I was aware of this, any time 1 2 anyone touches an airplane, there's the possibility 3 that they can do some harm, and I think what the Board is saying here and Mr. Guzzetti is saying we have a 4 5 maintenance system that works the vast majority of the 6 time. Obviously it's worked on DC-9 series before this because it hadn't before, and I don't know whether I'm 7 ready to abandon that system yet. 8

9 MR. CLARK: No, I don't think -- we're in no 10 way, shape or form abandoning that system at all. 11 That's not the case at all. When we have a 12 demonstrated issue and this catastrophic loss, if we 13 can do something reasonable and take that issue away 14 and buy some margins for the mechanics, we want to do 15 that.

16 I'll point out that we try to buy margin for 17 the pilots. You know, many places that we put margins 18 in every time to try to mitigate and cut the risk. We 19 The engineers try to do it in all of the do it. 20 designs they work on, and there's no reason not to try 21 to buy margins when we can in a reasonable manner on 22 these airplane designs to buy margins for mechanics 23 making errors, and so that's -- I mean, that's the whole concept behind all this. It shouldn't be -- it 24 25 turns out to be a killer operation, hugely expensive,

1 extremely complicated, then I don't -- I think money's 2 better spent trying to take care of it on the 3 maintenance side.

4 MEMBER BLACK: This might be the logical 5 place to interpose the question about what about 6 jackscrew or stab trim control assemblies on other 7 types of airplanes?

8 MR. CLARK: Okay. What Member Black's 9 referring to, other airplanes have different 10 arrangements. Probably the most prominent out there 11 are the -- it's called the ball screw arrangement. Ιt 12 looks -- the shaft looks kind of like a jackscrew and 13 instead of having -- engaging threads from a nut, 14 there's a series of balls that cycle around and create 15 kind of a set of nut threads only using recirculating balls, and Mr. Guzzetti had done an extensive amount of 16 17 work on that. We have a lot of concern about that, and 18 in the process of trying to put the report together, I 19 talked him into putting that in abeyance until we got 20 the report together and then if we had time go back and 21 more fully develop -- we had a number of questions 22 about the issue of ball screws and where we were at and 23 potential failure modes and things we didn't know, and 24 in the process, it absorbed all of his time and even 25 though he and I are kind of on opposite sides of the

1 fence, we still respect him very much and in fact, we 2 promoted him to be Deputy Director for our Regional 3 Operations.

So, I think that's a testament to what we think of his opinions. So, I don't want to be shooting myself in the foot bragging on him right now, but the --

8 MEMBER BLACK: You're making his case.

MR. CLARK: I know it. I know it. But that 9 10 -- but we try to be very fair about what the issues are 11 out on the table, but the -- we had decided to put that 12 in abevance and what we anticipated -- you know, get 13 this report done and out and almost immediately, and we 14 were looking at within two-three-four weeks trying to 15 bring that second recommendation to the Board about how 16 we really wanted to deal with those other actuating 17 mechanisms on transport category airplanes because 18 there are many out there that have similar features 19 that have the potential to get into single-point 20 failure modes. A lot of them have dual-load path 21 structure like this thing did, but we really haven't 22 addressed the loss of threads or the loss of the balls 23 out of the actuator. So, that's coming, but I also --24 Member Black's been very active out there doing a lot 25 of that research that we would like to have been

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153

1 working on while we were moving this report forward.

2 So, we're doing right now, Mr. Guzzetti had a 3 fairly comprehensive factual analysis and a 4 recommendation, and it was right on the edge of 5 incorporating and we believe there is an issue out 6 there for the rest of the fleet.

MEMBER BLACK: Well, ever how we choose to do 7 with it, I just think we're centering on one airplane 8 9 because it had -- one type of airplane because it had 10 the accident, but we certainly don't want to overlook 11 others and ever how we choose to get our 12 recommendation, perhaps some sort of a recommendation 13 that this just be a general consideration, somewhat 14 like we did in 427, is look at this, look at this issue 15 in the fleet, all of the fleets, and if there's a problem with it, we need to do something about it. 16

17 MR. CLARK: Yeah. We talked to staff about 18 You know, we can do the more extensive work and that. 19 hand that off to the FAA or I think in a sense, Jeff has really outlined the issue for other airplanes. 20 21 That could be incorporated into this report, and then 22 our Systems people would have to assign a person to kind of keep track of that to make sure we keep on the 23 24 focus over at FAA and so either way, we're prepared to 25 go either way, whatever the Board chooses.

1 ACTING CHAIRMAN CARMODY: Member Goglia? 2 MEMBER GOGLIA: You know, I've seen a list, 3 and I think George, you may have a copy of it, on these jackscrews, and it's the ones that use the acme nut, 4 5 not necessarily the reciprocating ball. It's 6 extensive, including some of the most recently-designed 7 airplanes, which there are virtually hundreds and hundreds on order and that's the regional jets. It is 8 -- I think that we're -- we need to address the entire 9 10 issue, the entire fleet, everywhere in our 11 recommendations. We keep saying DC-9 MD-80s, 717, but, you know, the regional jets, I think there's something 12 13 like 7 or 800 of them on order, and when you look at 14 the jackscrew that's used on them, it looks like 15 somebody put it in -- took the drawings, put it in the xerox machine and said reduce it by 50 percent and 16 17 printed it. 18 MR. CLARK: Oh, yeah. Yes. I fully agree with you. 19 MEMBER GOGLIA: It's extensive. Extensive. 20 21 Now, I have a couple more questions. 22 MR. CLARK: Your microphone, Member Black. MEMBER BLACK: I've received information from 23 24 two regional jet manufacturers that were kind enough to 25 send it to me just recently and I haven't had a chance

to analyze it, but it is -- they're selling rapidly, 1 and we need to find out if there is an issue here, it 2 3 needs to be addressed because it's a very active issue, and as you can see from the list, there are everywhere 4 5 from 707s and DC-8s all the way up through the RJs that 6 have some sort of an assembly similar to this. 7 Thank you. I'm sorry, John. 8 MEMBER GOGLIA: John, let's talk a minute 9 about the dual path, the single-point failure, and just 10 a minute ago, our Systems Analysis person here 11 mentioned the nut is a single failure in this design. 12 How do you feel about the screw and the fact 13 that it has the torque tube on the inside which gives 14 us an alternate path? 15 MR. CLARK: Well, I think that was clearly 16 meant to be a dual structural load path, and for everything we know about it, it does fulfill that on 17 the screw side. Yeah. 18 19 MEMBER GOGLIA: And would you agree with the 20 assessment that the nut in this particular installation 21 is 300-percent overload? It's robust enough? 22 MR. CLARK: Strength-wise? The threads are in place? 23 24 MEMBER GOGLIA: Yeah. 25 MR. CLARK: I think it's even much more than EXECUTIVE COURT REPORTERS, INC.

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156

I think it's -- I think you can wear it to the 1 that. 2 replacement limit 10 times. Strength-wise, if the 3 threads are in place, it's much, much more than that. 4 In fact, I'd point out that you saw the remnant and 5 much of that remnant had been pushed out of the way and 6 we were down to the last 100th of an inch of that 7 remaining thread and that was sufficient to operate and maintain strength with the thinness of that thread 8 9 element still reasonably in place. So, structurally, 10 it's the thread. The brass nut first meets any 11 standard we could dream up. Yeah.

MEMBER GOGLIA: I asked and had a jackscrew nut cut to give us a dual path, and it's not sound engineering. I actually have it here. I don't know if I want to bring it out, but with a hacksaw, with a simple hacksaw, I can make that one nut into two nuts and provide us with the redundancy that you're talking about.

MR. CLARK: Works for me. The -- what you want to -- the object there is, for -- there's a dual concentric path and what that means is you have one spiral of threads and then a second one that's interleaved within that. So, in theory, from the structural side, you could break off one set of threads and you would have the other thread, even though

1 they're interwoven.

2	What defeated this design was the wear, that
3	you really can't wear out one set of threads without
4	wearing out the other set. So, wear is the problem
5	that got us to the issue. So, structurally, the
6	threads in the dual concentric make sense. From wear
7	standpoint, that was the failure point.
8	MEMBER GOGLIA: Just by cutting the nut in
9	half on an angle, it satisfies the verbiage of the FAR.
10	MR. CLARK: Yeah. The issue right there,
11	John, is if you can wear out one side without wearing
12	out the other and that's the concern. I don't know
13	that that would do that in that case.
14	MEMBER GOGLIA: But that's not in the
15	certification requirement.
16	MR. CLARK: No, it isn't, but what we do
17	we certainly don't limit ourselves to what the FAA
18	rules were in place then or even what is in place now.
19	What we want to do is make sure we solve the problem.
20	MEMBER GOGLIA: Okay. I have one question,
21	and it goes back to Jeff, and I think it's going to end
22	up over at how quick we forget. No, not Ron
23	Battocchi. You can rest at ease.
24	The training for the mechanics back in '97
25	when they did the end-play check and Mr. Leontine is

the one who wrote it up at 40,000ths, did we get the training records and experience level of Leontine and the others who subsequently said that this -- redid the wear check and said it was

5 MR. CLARK: I did not, but Mr. McGill would 6 probably be better to answer that question. He's the 7 one that checked into some of that.

8 MR. McGILL: We looked at all the training records. I had probably 50 of them sent to my office, 9 10 but as you know, training in a 121 environment because 11 of the lack of definement that is such as flight 12 attendants, dispatchers, pilots, so forth, it doesn't 13 really tell you a lot. It just says, yes, they were 14 given some courses here and they would document them 15 whenever they got them. Mr. Leontine had courses documented that he had took, given by Alaska Airlines, 16 17 so did many other mechanics that we looked at, but 18 there is no structure to that and that's just -- that's 19 in the industry itself, not specifically Alaska 20 Airlines. They were kind of following suit.

So, what you can get from this is they went to some four hours or eight hours and did some sort of training. I don't know what happened because it's not recorded properly. So, we can never determine exactly the degree of sophistication nor can we figure out or

articulate in any manner what the training accomplished
 on these individual mechanics.

3 MEMBER GOGLIA: Okay. Thank you. I have no
4 further questions.

5 ACTING CHAIRMAN CARMODY: All right. I think 6 we're finished with this section then, and we can move 7 on to Flight Crew Decisionmaking.

8 MR. IVEY: Good afternoon, Madam Chairman,
9 Members of the Board.

10 I have a very brief presentation highlighting 11 the findings in the staff report concerning flight crew 12 decisionmaking. The Operations Group spent a great 13 deal of time evaluating the flight crew's actions and 14 their decisionmaking on the accident flight.

15 The report concludes that the crew's decision not to return to Puerto Vallarta immediately after 16 17 recognizing the trim system malfunction was understandable. The decision to divert to Los Angeles 18 19 rather than continue to San Francisco as originally 20 planned was prudent and appropriate. The use of the 21 autopilot when the horizontal stabilizer was jammed was 22 not appropriate. The captain should have kept the 23 slats and flaps extended when the airplane was found to be controllable in that configuration after the initial 24 25 dive. His retraction of the flaps and slats was not

1 appropriate.

2	The report also includes a recommendation for
3	clearer guidance to flight crews who encounter flight
4	control system failures. In particular, we believe
5	that they should complete only checklist procedures and
6	if not effective land at nearest suitable airports.
7	Pilots should not attempt any additional corrective
8	actions.
9	This concludes my brief presentation.
10	ACTING CHAIRMAN CARMODY: Thank you, Captain
11	Ivey.
12	Any questions? Member Hammerschmidt?
13	MEMBER HAMMERSCHMIDT: Could someone go into
14	the communications between the flight crew and the
15	Dispatch and maintenance people on the ground that were
16	that took place and whether or not the flight crew
17	was being helped by their ground support during the
18	flight?
19	MR. IVEY: Actually, the beginning of
20	attempted communications started over Mexico as the
21	flight was proceeding towards the border with the
22	United States. There are repeater stations down there
23	in which it's like a dial telephone, if you will, in
24	which they're able to dial in for assistance, and the
25	Operations Group interviewed the flight crew who was

paralleling the accident flight and actually reported that they had heard a couple of attempts to dial up, but that was not successful.

Once they reached the area of Tijuana,
Mexico, the accident crew did contact Maintenance
Control in Seattle and also the Los Angeles Operations
was listening on the conversation. So, the three were
actually on the same line at that point.

9 When the attempt was made to contact 10 Maintenance Control in Seattle, we were able to get a 11 written log more or less of the conversation. However, 12 as you know, the cockpit voice recorder began in the 13 middle of that conversation when the flight crew was 14 talking to Maintenance Control in Seattle.

I don't know if there's any specifics that you're interested in regarding that conversation I may be able to answer.

MEMBER HAMMERSCHMIDT: Well, I was just 18 19 wondering if the ground support should have given the flight crew just better information in terms of getting 20 21 the plane on the ground rather than suggesting all 22 these optional things to look for in the cockpit. 23 MR. IVEY: I think the flight crew believed 24 that they had a jammed stabilizer. Obviously they had 25 been hand-flying the airplane and quite well at 31,000

feet for the duration of the flight from when the trim 1 2 actually ceased operation. But the crew had no way of 3 knowing what had transpired in the back of the airplane. Similarly, when talking to Maintenance 4 5 Control, they, too, would have had no idea of the 6 nature of the problem that the crew was experiencing, other than to establish a dialogue to try to understand 7 8 and through the limits of their knowledge offer 9 suggestions.

In the case of the mechanic who was also monitoring the conversation in the Los Angeles Maintenance Facility, he was trying to volunteer his help as well, but I don't think anyone, anyone on the ground or in the air, really understood the nature of the problem.

MEMBER HAMMERSCHMIDT: Thank you. That's all 17 I have.

18 ACTING CHAIRMAN CARMODY: Member Goglia?
19 MEMBER GOGLIA: Yes, I have a few questions.

I agree with you, Mr. Ivey. I don't think anybody knew. This airplane after the first event was clearly flying in uncharted territory, and having said that, I'm still very troubled by the role of Dispatch and Maintenance Control in Seattle, you know, and as you were talking, I recalled one or two sentences in

the -- it's actually in the report, where the captain 1 asked for the numbers for Los Angeles because of his 2 3 intention to return to -- to divert to Los Angeles, and the dispatcher gives him the numbers for San Francisco. 4 5 Now, there's no doubt in my mind, having been on the 6 one end of those microphones more than once, that 7 that's pressure being put on the captain to take the airplane to its original landing site and this guy, 8 this crew finds themselves in a very difficult 9 10 situation and at least part of the time when they're on 11 the radio asking for help essentially from others in 12 the organization, it wasn't there. It was adding to 13 the problem and not adding to the solution, and I'm 14 really bothered by the fact, and I was going to raise 15 this a little further one, that we really need to have recommendations in this report that deal with that and 16 how the flight crews interface with Maintenance 17 Control. 18

19 I know from my experience in the industry, 20 that the FAA has struggled with this as well, and it's 21 about time that we brought this out into the open and 22 started to address it.

23 MR. IVEY: I certainly agree that there was 24 not a lot of assistance provided and to cite two 25 examples, Number 1, when the flight crew asked to talk

to an instructor, someone up on the second floor of the 1 2 building, that was never acknowledged nor was that 3 request fulfilled. Similarly, that Maintenance Control actually passed off the idea of helping the crew obtain 4 5 the center of gravity and the information needed for 6 landing and passed that off to -- asked L.A. to 7 calculate these numbers for them, and in fact, the L.A. Operations agent on duty at the time actually was 8 9 unable to do so, even though they had had that training 10 early on as working in Operations. 11 So, that was not the assistance that they 12 could have used. I totally agree. 13 MEMBER GOGLIA: Okay. I'm going to make a 14 request that we modify this as a motion at one point. Do you want -- Madam Chairman, do you want to do that 15 now or you want to wait until --16 17 ACTING CHAIRMAN CARMODY: What is it you're 18 referring to? The recommendations? Because we haven't 19 gotten --20 MEMBER GOGLIA: Yes. I want to add an

21 additional recommendation which I do not have language 22 for.

ACTING CHAIRMAN CARMODY: Well, I think we'd
have to see the language before we consider it.
MEMBER GOGLIA: Well, I have another way of

1 dealing with it.

2 ACTING CHAIRMAN CARMODY: Well, you may want 3 to at the break circulate the language and then we can talk about it with the recommendations. 4 5 MEMBER GOGLIA: Well, we may at the break ask 6 staff to prepare something and present it to us. ACTING CHAIRMAN CARMODY: Does staff know 7 what you want because I don't? 8 9 MEMBER GOGLIA: We'll talk about it. 10 ACTING CHAIRMAN CARMODY: We can talk. 11 MEMBER GOGLIA: We'll try to --12 MS. WEINSTEIN: Chairman Carmody, what we can 13 do from safety recommendations is go and do a run on 14 prior recommendations on dispatch and that might help Member Goglia with some language. We'll do that now. 15 16 ACTING CHAIRMAN CARMODY: Okay. That's a 17 qood idea. 18 All right. Are you through with questions 19 for now? 20 MEMBER GOGLIA: Yes. 21 ACTING CHAIRMAN CARMODY: Member Black? 2.2 MEMBER BLACK: Thank you. 23 Dave, could we have up the slide again where 24 you list the conclusions? Could you put all of them 25 up? This is so fuzzy on my screen, that even with my

1 glasses, I have trouble with it.

2 I certainly agree with the first two, and I 3 have some -- really, the third one, also, and I tried to find in my records a copy of the checklist. 4 I'm 5 sure you know what I'm talking about, but there 6 actually is a checklist item that you run for a stab problem or a jam that has a line in it that says do not 7 8 engage the autopilot, is that not --9 MR. IVEY: That's correct. In fact, if 10 you'll look into the staff report behind Page 151, that 11 is the stabilizer inoperative procedure. 12 MEMBER BLACK: Okay. I read that one and 13 knew that one. The difficulty that we were talking 14 about a minute ago about this incident and with the 15 crew's response to it, I do have some difficulty with 16 the retraction of the flaps and slats, and I guess one 17 of the fortunate or maybe unfortunate things is one of 18 the things a board member does is get to listen to the 19 actual taperecordings and it's often quite distressing 20 to do this. But there isn't any guidance about what 21 22 happened basically after the first event. They were on 23 their own. Would you agree with that?

24 MR. IVEY: I think the guidance after the 25 first event changed significantly because the only two

procedures that are in the Quick Reference Handbook, the QRH as it's called, related to stabilizer is a runaway stabilizer and the stabilizer inoperative. In both those cases, prior to the first dive, these are abnormal procedures.

I as a pilot, if I'd taken a 7,000-foot dive without the ability to get this airplane back to a stable and level position, I've now gone from an abnormal situation --

10 MEMBER BLACK: Sure.

MR. IVEY: -- into an emergency situation. MEMBER BLACK: Emergency, yes. Absolutely. And there are lots of others that agree with you on that.

15 I just feel like and what John was saying a 16 minute ago, sort of summed up, is this has never 17 happened before. There's no documentation that this 18 has ever occurred before, and the pilots gave some 19 indication of understanding vaguely what was back in 20 the tail of the airplane, but they didn't -- they 21 probably couldn't have drawn a picture of it to be very 22 accurate, and I for one think that to have the fourth 23 finding there is -- I suspect that if they had a chance 24 to do it over again, they would agree with that position, but given the situation they were in at that 25

time, they had no prior guidance and so we can -- I don't expect you to agree or disagree with that. I just -- I have some difficulty with that one.

4 I also have some comments on what John said. 5 I think that it is especially distressing to find that 6 pilots had asked for some help from Training and I can't help but wonder if some people, some instructor 7 pilots had come down to talk, that they might have 8 9 changed some of the actions that occurred before the 10 first event, but we'll never know the answer to that 11 because that didn't occur.

12 There also was another bit that John talked about that distressed me, is that clearly the 13 14 dispatcher to me from listening to the part of the 15 recording that we have was very interested in having the crew go to San Francisco. There was some 16 discussion of flow control or air traffic control 17 18 procedures that might be restrictive. There was some 19 discussion about immigration and naturalization because 20 they had people -- it was an international flight, and 21 all of this seemed inappropriate to me to be talking 22 about with an airplane that has mechanical problem with 23 88 souls on board is somewhat distressing to me, and I don't know whether there's some kind of a 24

25 recommendation or something.

1 It would seem to me that this -- even though 2 they hadn't declared an emergency at that point, that 3 they certainly deserved expedited handling and certainly deserved all the help that could be provided 4 5 to them and hopefully we learned something from that. 6 Thank you, Madam Chairman. 7 ACTING CHAIRMAN CARMODY: Anything else on 8 this section? 9 (No response) 10 ACTING CHAIRMAN CARMODY: Thank you, Captain 11 Ivey. 12 Then we can go on to the last --MEMBER BLACK: Madam Chairman? 13 ACTING CHAIRMAN CARMODY: Yes? 14 15 MEMBER BLACK: Let me add one more thing, 16 Something that might have gone unnoticed here too. 17 when I was reading the transcript again. This crew 18 kept this airplane out over the water. We don't know 19 what would have happened had they turned, had they not 20 -- had they kept the flaps out and turned immediately 21 for LAX. There are varying opinions on whether the 22 airplane would have been able to maneuver successfully 23 to the -- to LAX and land. It could very well be 24 there's some people in Burbank who owe their lives to 25 these two guys and I don't know whether that's been

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170

1 appreciated by people enough or not, but I think it 2 should be.

3 ACTING CHAIRMAN CARMODY: All right. Mr.4 Guzzetti?

5 MR. GUZZETTI: Thank you, Madam Chairman. 6 This is -- this presentation is actually very 7 brief. I don't even have any slides, other than the 8 cover slide, and it addresses the issue involving 9 jackscrew assembly overhaul procedures.

10 Although the accident jackscrew assembly was 11 never overhauled, the Systems Group investigation 12 evaluated overhaul procedures and practices and 13 identified several deficiencies in the DC-9 Overhaul 14 Maintenance Manual and the practices of several 15 maintenance facilities that were visited during the 16 course of this investigation.

17 The most significant of these findings was that there is currently no requirement for overhaul 18 19 facilities to record or inform customers of the end-20 play measurement of the assemblies that are being 21 returned to the airlines after they've been overhauled. 2.2 Because overhaul does not necessarily involve restoring the end play to manufacturing specifications, 23 24 the absence of such a requirement could result in an 25 airline unknowingly returning an assembly to service

1 with a higher-than-expected end-play measurement.

There's several other issues related to overhauls, but that's the most significant. The draft report includes several recommendations to address these issues as well as other shortcomings in the overhaul process.

7 That's it. That concludes my presentation.
8 ACTING CHAIRMAN CARMODY: All right. Thank
9 you.

Member Hammerschmidt, any questions? 10 11 MEMBER HAMMERSCHMIDT: No questions. 12 ACTING CHAIRMAN CARMODY: Member Goglia? MEMBER GOGLIA: Mr. Guzzetti, I share your 13 14 concerns on the overhaul, so-called overhaul 15 facilities, other than the manufacturer's facility, 16 which I found to be on multiple visits truly a first-17 class operation.

I'm concerned because of the -- with the 18 19 others that do the work because of the data that's 20 available or lack of data. You know, Boeing calls this 21 design proprietary, and the repair information that's 22 available to facilities to accomplish these tasks is 23 not very robust, and this is not the only place that --I'll have to turn it off. The only that that -- that 24 25 we have that. We have it in other areas of other

1 airplanes, and I'm surprised that we didn't have any 2 verbiage in the report to address that. There is a 3 little bit, but I'm surprised that we didn't have more 4 on point, and can you enlighten me why?

5 MR. GUZZETTI: Yes, Member Goglia. I think 6 it's simply because the Systems Group at the request of 7 the investigator-in-charge was out chasing jackscrews 8 all over the place. We must have visited over two 9 dozen cities in a two-year time span, and we could only 10 go so far in depth into the overhaul process, and so 11 what we decided to do in terms of prioritizing and 12 triaging our efforts, we decided to just really solely focus on the jackscrew assembly. That was it. We 13 14 didn't want to start to get into more global issues 15 related to overhaul facilities which I'm sure there are 16 plenty of global issues out there.

17 Several of the overhaul facilities that we 18 visited gave us an earful about some of the issues that 19 you've addressed. So, in the context of this 20 particular investigation, we really just focused our 21 efforts on the jackscrew assembly and the essence of 22 utilizing our resources as best as we could.

That being said, you mentioned lack of data and the data not being robust. I would certainly agree with you. In fact, again as it only relates to the

jackscrew, the staff feels that the DC-9 Overhaul 1 Manual instructions for the jackscrew assembly are 2 3 lacking, is the best word I quess I could -- is a kind word I could use for it, and I've documented that to 4 5 great detail in my factual group chairman's report and 6 we've highlighted some of that in the draft factual 7 that you have before you. But we just didn't have the 8 resources to tackle the global issues.

9 MEMBER GOGLIA: Well, Mr. Clark, can I 10 interrupt your reading there for a second? Just 11 earlier, you made -- you talked about what we should 12 do, what we can do.

13 MR. CLARK: Right.

MEMBER GOGLIA: All right. And since long before I came to the Board and after I've come to the Board, I have felt that we don't do what we should do in the maintenance arena, and this report just continues my feelings in that area.

19 MR. CLARK: What's that?

20 MEMBER GOGLIA: Well, here's an example of 21 manual instructions, instructions for continued 22 airworthiness, the keystone of the operation, safe 23 operation of airplanes, and they're lacking, and we do 24 identify it in the text of the report. We don't 25 identify it in any of the conclusions, and we have no

1 recommendation. Why not?

2	MR. CLARK: I don't know.
3	MEMBER GOGLIA: Well, I guess you can say I
4	don't know, but, you know, that's your job. You're
5	supposed to know. So, we'll deal with that as we go on
6	further with the report, but that's just a concern, and
7	it goes on and on and on. We need to start dealing
8	with this stuff.
9	MR. CLARK: You commented about the specific
10	issue of maintenance, but I think trying to put the
11	control, I think we do have recommendations that do try
12	to deal with the control and get the proper not
13	necessarily the documentation but to try to get proper
14	control of these critical parts.
15	MEMBER GOGLIA: But we don't get proper
16	control of the people who are dealing with them, and we
17	haven't made recommendations to it. Mr. McGill
18	testified or commented moments ago about the training.
19	Where's the training recommendation? Where's the
20	qualifications for the people? It's missing.
21	MR. CLARK: Yeah.
22	MEMBER GOGLIA: It's missing.
23	MR. CLARK: I believe we do have
24	recommendations specifically to this issue, to properly
25	train the mechanics to deal with this critical safety
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item. We put those out before, and we have others,
 also.

ACTING CHAIRMAN CARMODY: We made them to the FAA and they've not acted on them yet, the ones we made last year.

6 MEMBER GOGLIA: No further questions.

ACTING CHAIRMAN CARMODY: Member Black, anyquestions?

9 MEMBER BLACK: I, too, am somewhat distressed 10 to find the -- it might even be a tribute to the 11 jackscrew assembly that it could survive that process 12 and we not have had other accidents because some of the things that are described in Jeff's factual and the 13 14 addendums are very frightening and these things get --15 a jackscrew could actually get back to the audience, a 16 jackscrew could actually get back on an airplane with, 17 let's say, a 038 wear level and there would be no 18 notification to the airline. Unless they measured it, 19 they wouldn't know that it was very nearly worn out 20 because there was no requirement for it. So, it's just 21 atrocious, some of the things that could have happened 22 and probably did happen and somehow they survived it. 23 ACTING CHAIRMAN CARMODY: Is that it, Member Black? 24

25 MEMBER BLACK: Yes, ma'am.

1 ACTING CHAIRMAN CARMODY: Okay. Member Hammerschmidt, anything from you? 2 3 MEMBER HAMMERSCHMIDT: No. ACTING CHAIRMAN CARMODY: I propose we take a 4 5 15-minute break and come back and we'll start on the 6 Conclusions then. 7 Thank you. 8 (Whereupon, a recess was taken.) 9 ACTING CHAIRMAN CARMODY: All right. Let's 10 resume. 11 Mr. Clark, I believe you had something else 12 you wanted to add. MR. CLARK: Just a little bit. With the 13 14 conversation going on between the members and Captain 15 Ivey, this -- we have this Finding Number 17 that -where we -- and it goes with the last bullet on Captain 16 17 Ivey's presentation, where we talk about this crew 18 should not have retracted the flaps and slats after 19 they had extended it. 20 In one sense, we fully recognize this is 21 20/20 hindsight and that they were in uncharted 22 territory, but what we were after with that is not to 23 criticize the crew in this situation but to try to take a lessons learned into the -- out into the future, and 24 25 in a number of accidents and incidents, we've seen that

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177

1 the crew end up doing things that either cost more time 2 or take them further away from a good landing 3 condition.

4 Let me just step through a couple here, if I 5 may. In this case, this crew had just gone through a 6 very serious upset and they were in a very critical 7 emergency-type situation, and as they needed to get headed for the airport and they were doing that, and 8 part of the thing you have to do is you have to start 9 10 getting the airplane configured, getting it slowed down 11 and still keep progressing towards the airport, and 12 some of the, I guess, adages in aviation, you know, if you do something that isn't working, undo it fast, but 13 14 -- or go back to the last thing that was working for 15 you, but in this case, they had to progress toward some 16 sort of landing configuration or that was not 17 unreasonable to do so. So, the fact that the slats got extended and we started getting slowed down is 18 19 perfectly reasonable.

It's not clear to us that there was any reason to retract the flaps and slats, but we weren't there. The captain was. So, he made his decision for whatever reason he chose to. But if there's not a good reason for the crew, keep what you've got and keep that progression going to get that airplane safely down on

the end of the runway. So, that was the intent out of this, to go after a lessons learned in the future, not to take an unfair hit because we weren't in that cockpit to know what this guy was doing or why he did what he did. So.

ACTING CHAIRMAN CARMODY: No, I understand.
7 I think that's --

8 MR. CLARK: Part of that stemmed out of the 9 thing like on the ValuJet where there was a fire on 10 board and we didn't make recommendations in that, but 11 there's a lot of discussions at staff level that the 12 crew took several minutes and then took a radar vector 13 kind of still going outbound and there was a lot of 14 discussion on that one to try to get people thinking 15 about making the turn, get headed -- get to the 16 airport, get to safe haven, as fast as you can, 17 regardless of what air traffic's telling you or 18 whatever.

19 ACTING CHAIRMAN CARMODY: Hm-hmm.

20 MR. CLARK: We saw elements of that in the 21 Swiss Air 111, and I don't want to comment too much 22 because the Canadians are still having issues with 23 their report. But we also saw a positive benefit not 24 too long ago. We had a maintenance issue on an AirTran 25 airplane, had a heck of a fire cooking on board, and

that crew beat heat to the airport just as fast as they 1 2 could, and had they not done that, we fully expect we 3 could have lost another airplane due to a fire on 4 board. 5 So, that's the purpose of this, is go after 6 the lessons learned. 7 ACTING CHAIRMAN CARMODY: Yeah. No, I understand. Thank you. Excuse me one second. 8 9 (Discussion off the record.) 10 ACTING CHAIRMAN CARMODY: All right. I think 11 what we'll do now is proceed with reading the Conclusions. There are guite a few of them, and I 12 13 think there are going to be some changes as I go along. 14 So, why don't I start and -- one at a time. There may be many that don't need changing, but I think there 15 16 will be some that will. So, let me begin with the 17 Findings. 18 Number 1. The flight crew on Alaska Airlines Flight 261 were properly certificated and qualified and 19

had received the training and off-duty time prescribed by the Federal Air Regulations. No evidence indicated any pre-existing medical or other condition that might have adversely affected the flight crew's performance during the accident flight.

2. The airplane was dispatched in accordance

25

with FAA regulations and approved Alaska Air 1 procedures. The weight and balance of the airplane 2 3 were in limits for dispatch, take-off, climb, and 4 cruise. 5 3. Weather was not a factor in the accident. 6 4. There was no evidence of a fire or an impact with birds or any other foreign object. 7 8 5. No evidence indicated that the airplane 9 experienced any pre-impact structural or system 10 failures, other than those associated with the 11 longitudinal trim control system, the horizontal 12 stabilizer and its surrounding structure. 13 6. Both engines were operating normally 14 before the final dive. 15 7. Air Traffic Control personnel involved with the accident flight were properly certificated and 16 17 qualified for their assigned duty stations. The longitudinal trim control system on 18 8. 19 the accident airplane was functioning normally during 20 the initial phase of the accident flight. 21 9. The horizontal stabilizer stopped 22 responding to autopilot and pilot commands after the 23 airplane passed through 23,400 feet. The pilots recognized that the longitudinal trim control system 24 25 was jammed, but neither they nor the Alaska Airlines

1 maintenance personnel could determine the cause of the 2 jam.

10. The worn threads inside the horizontal stabilizer acme nut were incrementally sheared off by the acme screw and were completely sheared off during the accident flight. As the airplane passed through 23,400 feet, the acme screw and nut jammed, preventing further movement of the horizontal stabilizer until the initial dive.

10 11. The accident airplane's initial dive 11 from 31,050 feet began when the jam between the acme 12 screw and nut was overcome as a result of operation of 13 the primary trim motor. Release of the jam allowed the 14 acme screw to pull up through the acme nut, causing the 15 horizontal stabilizer leading edge to move upward, thus 16 causing the airplane to pitch rapidly downward.

17 12. The acme screw did not completely 18 separate from the acme nut during the initial dive 19 because the screw's lower mechanical stop was 20 restrained by the lower surface of the acme nut until 21 just before the second and final dive about 10 minutes 22 later.

13. The cause of the final dive was the lowcycle fatigue failure of the torque tube, followed by
the failure of the vertical stabilizer tip fairing

1 brackets which allowed the horizontal stabilizer

2 leading edge to move upwards significantly beyond what 3 is permitted by a normally-operating jackscrew 4 assembly.

5 The resulting upward movement of the horizontal 6 stabilizer leading edge created an excessive upward 7 aerodynamic tail load which caused an uncontrollable 8 downward pitching of the airplane from which recovery 9 was not possible.

10 14. In light of the absence of a checklist 11 requirement to land as soon as possible and the 12 circumstances confronting the flight crew, the flight 13 crew's decision not to return to Lic Gustavo Diaz Ordaz 14 International Airport, Puerto Vallarta, immediately 15 after recognizing the horizontal stabilizer trim system 16 malfunction was understandable.

17 15. The flight crew's decision to divert the
18 flight to Los Angeles International Airport, Los
19 Angeles, California, rather than continuing to San
20 Francisco as originally planned, was prudent and
21 appropriate.

22 16. The flight crew's use of the autopilot 23 while the horizontal stabilizer was jammed was not 24 appropriate.

25 Member Goglia?

MEMBER GOGLIA: Captain Ivey or Mr.
Rodriguez, on this recommendation, do we have any
indication that possibly the flight crew may have
switched off the stabilizer system, pulled the circuit
breakers, or --

6 MR. IVEY: With regard to the stabilizer 7 inoperative system, --

8 MEMBER GOGLIA: Right.

9 MR. IVEY: -- there is a reset allowed for 10 the circuit breakers if tripped, and under general 11 circuit breaker procedures, you're allowed a reset once 12 of a circuit breaker. If it popped again, of course, 13 then you would leave it to pop. You wouldn't reset it. 14 MEMBER GOGLIA: Isn't there a trim switch 15 shut-off?

16 MR. IVEY: There is. The system -- it 17 depends on whether you've got a run-away stabilizer. 18 In that case, there's a red guarded switch that would 19 stop the high-speed trim from operation and that's a 20 switch down by the pilot, the captain's right-hand 21 side, and then that stops high-speed trim. Then you 22 assess the situation in the case of run-away.

In the case of the stabilizer inoperative,
there are circuit breakers that are also mentioned that
you can check to see if that could be part of the

1 problem.

2 MEMBER GOGLIA: But in an effort to lighten 3 their load, could they not pull the circuit breakers to 4 remove electrical power from the motors and then engage 5 the autopilot to fly?

6 MR. IVEY: No, not by procedure, because the 7 autopilot uses the low-speed trim system as part of its 8 controls. So, you would be, as they were, you'd be 9 masking the situation by engaging the autopilot because 10 it would not be using low-speed trim to trim out any 11 undue loads that the autopilot would be experiencing, 12 and in the case where the flight crew engaged the 13 autopilot, again upon the disconnect which was just 14 preceding the dive, the first dive, apparently the 15 captain was using some other than the normal means of 16 disconnect of the autopilot while the co-pilot was the flying pilot. So, here he is holding the control yoke 17 18 and more than likely we believe that he either 19 attempted to use the high-speed trim which will 20 disconnect the autopilot on the control yoke or the 21 high-speed longitudinal suitcase handles which is an 22 alternative measure. That also would disconnect the 23 autopilot.

But the autopilot would not have been able to use the alternate trim because of the jam as we know,

and so it still would have masked the condition as to what flight controls were being held in, and once the autopilot released, then the elevator would go more than likely to an entrail position or at least until the pilot flying was able to grasp whatever control inputs were different than what he expected and to correct the elevator.

8 MEMBER GOGLIA: We said that it took about a 9 hundred pounds of force for them to hand-fly this 10 airplane? Or was it 50 pounds for the cruise and then 11 it was a hundred pounds?

MR. RODRIGUEZ: Initially, it was 50 pounds in the climb-out, sir, and in the recovery, it was a 14 130 to a 140.

MEMBER GOGLIA: Okay. Gotcha. All right.Thank you.

17 MR. IVEY: Yes. The crew did a very nice job at 31,000 feet flying. In fact, when you look at that 18 19 FDR trace, they held altitude very close and they had 20 actually increased speed. That does two things. That 21 actually increases your fuel burn which gets the weight 22 down which is certainly a necessary consideration for 23 landing. Your air speeds are going to be based upon 24 your gross weight for landing, and they found what I 25 believe to be an optimum speed at that altitude that

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really did release a lot of those control pressures 1 that they initially encountered. So, they found a good 2 3 harmony, if you will, hand-flying the airplane at 31,000 feet. 4 5 MEMBER GOGLIA: Okay. Thank you. ACTING CHAIRMAN CARMODY: 17. The captain 6 7 should have kept the slats and flaps extended when the 8 airplane --9 MR. CLARK: We need your microphone. 10 ACTING CHAIRMAN CARMODY: I'm sorry. Thank 11 you. 12 The captain should have kept the slats 17. and flaps extended when the airplane was found to be 13 14 controllable in that configuration after the initial 15 dive. MEMBER GOGLIA: Okay. Go ahead, George, you 16 17 can start. MEMBER BLACK: I'll just repeat what I said a 18 minute ago. I understand what you're saying, John, and 19 20 I think there's nothing wrong with having it in the 21 text. I don't necessarily think that there's any 22 purpose in having it in the Findings, and I would hold 23 that we just leave this one out as a Finding because it 24 certainly is in hindsight a great idea, but with 25 everything going on, the way I read this, we're -- when

they say "should", we're holding them responsible for 1 it, and I'll bet they would have liked to have done it, 2 3 too, although it probably wouldn't have made any 4 difference. 5 ACTING CHAIRMAN CARMODY: Is there another way we could say it that -- other than should? I think 6 7 it's worth preserving the idea just for future lessons, 8 but I take your point that it's not intended to be a 9 criticism of the crew. 10 MEMBER BLACK: Well, --11 ACTING CHAIRMAN CARMODY: Is there nothing 12 thing we could say or any other --13 MEMBER BLACK: -- I suppose we could say in 14 retrospect. 15 ACTING CHAIRMAN CARMODY: Well, I mean, that -- this is all in retrospect. 16 17 MEMBER BLACK: That's what I'm saying. 18 MEMBER GOGLIA: Well, I agree with that, but, 19 you know, I don't think we need to use these words. 20 You said it very well without using any of these words 21 after you restated it. So, maybe we should just agree 22 to lift this verbiage out of here and circulate before 23 the next few days some new language that clearly says what you articulated to us here because I think what 24 25 you said was right. What's written here, I can't

1 support.

2 ACTING CHAIRMAN CARMODY: Captain Ivey? 3 MR. IVEY: The fact that the crew had selected the slats and flaps to 11, as Mr. Clark 4 5 stated, ultimately you're going to have to slow the 6 airplane and configure the airplane for landing. They took those steps. In fact, the captain initially did 7 what I think was a very proper approach, took a proper 8 approach in that he asked for the slats first, a 9 10 methodical and slow approach to attempting to reduce 11 this airplane down to a target air speed of a 180 12 knots. Once he got slats, he was satisfied. 13 I will 14 say this, that there was no remarks on the CVR 15 indicating to the contrary because if in fact this 16 airplane had at any point started to generate an 17 increased control pressure or something that he was not 18 able to maintain, then you would go back to, as you 19 say, a happy position or somewhere where you were in controllable flight. So, Flaps 11 was the next 20 21 selection. 22 It's my understanding that you can actually 23 -- this is from the manufacturer. It's my 24 understanding that you can take that flap handle and 25 you could very gently move this thing back towards from

zero flaps towards 11 degrees of flaps in increments,
 and that would have been my approach to the flap
 selection.

4 Nevertheless, 11 degrees of flaps was 5 selected and the co-pilot actually asked the captain, 6 "How does it feel?" He says, "It feels pretty good." 7 And so, they were at a configuration that would enable the airplane to slow and the next critical factor in 8 trying to land this airplane at some point in time is 9 10 going to be trying to drop the landing gear, and I 11 believe that there would have been a case of 12 preparation, saying that as I drop this landing gear, if I lose control of this airplane, then bring that 13 14 landing gear right back up. We're just -- if it 15 doesn't work, it doesn't work.

16 So, ultimately based upon the configuration 17 that they were able to achieve, they're either going to 18 have to land with gear down, land with gear up, and not 19 to belabor this point, but both of these gentlemen were 20 military pilots, were very familiar with all the military fields around there, and their choice of Los 21 22 Angeles was excellent because they had 12,000 feet of 23 runway. March Air Force Base. There are numerous 24 bases around there that have got lots of runway, but 25 most importantly, in any military pilot that had flown

in California as these two gentlemen had, would be very much aware of Edwards Air Force Base which is the best airport we got in the country. There's over 5,000 feet -- five miles of paved runway at Edwards Air Force Base, and I think even I could make a decent landing out there on five miles.

But furthermore, the dry lake bed is -- it 7 just goes on forever. The space shuttle lands on that. 8 9 So, if in fact you were not able to get the landing 10 gear down and you were traveling at very high rates of 11 speeds, there were a lot of options. Unfortunately, 12 the crew was not able to move through all those steps in decisionmaking. So, I do believe that once you had 13 14 achieved slats and flaps 11, that it should have 15 remained there.

16ACTING CHAIRMAN CARMODY: Mr. Clark, I17noticed you had a piece of paper. Have you got a18redraft of this, by any change, or some suggestions?19MR. CLARK: No. We're working on the one20Member Goglia suggested in an earlier conversation.21ACTING CHAIRMAN CARMODY: All right. Member22Black?

23 MEMBER BLACK: How about leaving the flaps 24 and slats extended at Time 16:18:00 might have allowed 25 better control of the aircraft?

MR. CLARK: I believe that's true. It's the -- I think it's somewhat a little indirect from the concern of the issue of undoing or taking a step back. So, I --

5 MR. RODRIGUEZ: Madam Chairman, could I throw 6 my oar in?

7 ACTING CHAIRMAN CARMODY: Yes, please do. 8 MR. RODRIGUEZ: I feel that in this case just 9 the opposite of what a lot of people have been 10 expressing. I believe that the safety message here is 11 if people don't already know it, and I would have 12 thought they would, as you progress toward a landing in 13 any kind of an emergency situation, each step in the 14 progression, barring loss of -- further loss of control 15 or something, is an irreversible step, and so once the flaps were extended and the slats were out, I feel they 16 17 should have been left out. I feel that as a finding, 18 for those who may not be aware of that kind of a 19 philosophy, I think it's an important safety message 20 for it to be highlighted in the Findings, and perhaps 21 if you want to -- I would offer some alternate language 22 which I haven't written down, but if you come at it 23 from a different direction and say that something to the effect that we were unable to understand the 24 benefit to be derived by raising the flaps and then say 25

1 that there was a possible benefit to have left them 2 down or something of that nature, the safety message 3 comes out without perhaps any sense of condemnation of 4 the crew specifically.

5 ACTING CHAIRMAN CARMODY: Well, why don't we 6 do this? Perhaps you could -- staff could continue to 7 work on this and we could circulate language later, if 8 necessary, for the board members. I think we kind of 9 have a sense we'd like something in here, but we want 10 it worded differently.

MEMBER BLACK: Yes. Something like Rod's talking about, if better worded, of course, would --(Laughter)

ACTING CHAIRMAN CARMODY: Well, just to convey the safety message. So, let's --

16 MR. CLARK: We'll give Captain Ivey a shot at 17 it.

18 MEMBER BLACK: Why don't we let Karen write 19 it?

20 MR. CLARK: Okay. We'll do that. We 21 understand what your concerns are and we'll try to make 22 sure we address them.

ACTING CHAIRMAN CARMODY: Okay. Let's kind of put a little question mark on that one.

25 All right. 18. Without clearer guidance to

flight crews regarding which actions are appropriate and which are inappropriate, in the event of an inoperative or malfunctioning flight control system, pilots may experiment with improvised troubleshooting measures that could inadvertently worsen the condition of a controllable airplane.

7 19. The acme nut threads on the accident 8 airplane's horizontal stabilizer jackscrew assembly 9 wore at an excessive rate.

10 20. Alaska Airlines use of Aeroshell 33 for 11 lubrication of the jackscrew assembly, acme screw 12 thread surface finish, foreign debris, and abnormal 13 loading of the acme nut threads were not factors in the 14 excessive wear of the accident acme nut threads.

15 21. There was no effective lubrication on
16 the acme screw and nut interface at the time of the
17 Alaska Airlines Flight 261 accident.

MEMBER BLACK: Just an editorial. Karen, Ms. Bury, should that be lubricant rather than lubrication? In other words, grease? Don't worry about it. It can't be of any consequence. Lubricant. We're really saying that there was no material on it which would be the lubricant.

ACTING CHAIRMAN CARMODY: Well, yeah.MEMBER BLACK: Just leave it then. No

1 problem.

ACTING CHAIRMAN CARMODY: Okay. 2 22. The 3 excessive and accelerated wear of the accident jackscrew assembly acme nut threads, was the result of 4 5 insufficient lubrication which was directly causal to 6 the Alaska Airlines Flight 261 accident. 23. Alaska Airlines extension of its 7 8 lubrication interval for its McDonnell-Douglas MD-80 horizontal stabilizer components, the last of which was 9 10 based on Boeing's extension of the recommended lubrication interval, increased the likelihood that a 11 12 missed or inadequate lubrication would result in 13 excessive wear of jackscrew assembly acme nut threads and therefore was a direct cause of the excessive wear 14 15 that led to Alaska Airlines Flight 261 accident. The Federal Aviation Administration's 16 17 acceptance of those extensions was a contributing factor. 18 19 I'd like to propose a change to this language 20 to say Alaska Airlines extension of the lubrication 21 interval, etc., and the FAA's acceptance of those 2.2 extensions increased the likelihood and therefore was a 23 direct cause of the excessive wear that led to the 24 accident. In other words, I'm saying the FAA was more 25 than a contributing factor.

1 Do I take by your silence you're agreeing or do members have comments on this? 2 3 MEMBER GOGLIA: I'm trying to digest it. ACTING CHAIRMAN CARMODY: Okay. All I'm 4 5 doing is moving the last sentence up and put it after 6 the first comma, so it's both Alaska Airlines extension 7 and FAA's acceptance which resulted in excessive wear, 8 was a direct cause of the excessive wear that led to 9 the accident. 10 John? 11 MEMBER HAMMERSCHMIDT: Well, from a meeting process standpoint, we're going to be edging into the 12 13 probable cause determination in a few of these 14 conclusions. 15 ACTING CHAIRMAN CARMODY: Right. 16 MEMBER HAMMERSCHMIDT: And I haven't quite 17 digested the different options we have before us at this point. 18 19 ACTING CHAIRMAN CARMODY: All right. Good 20 point. Well, why don't we -- I'm going to put a mark 21 on this one and hold it, and after we discuss probable 22 cause, we may need to return to this one. Is that 23 reasonable? Okay. 23. 24 24. When lubricating the jackscrew assembly, 25 removal of used grease from the acme screw before

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1 application of fresh grease will increase the

2 effectiveness of the lubrication.

3 25. MEMBER GOGLIA: We didn't talk about that at 4 5 all during -- I think Joe Kolly, I think that's your 6 area. You know, what are we basing that on? 7 MR. GUZZETTI: Member Goglia, we -- you're We didn't talk about it, but it is addressed in 8 right. 9 the report, and you're right. Dr. Kolly is kind of 10 tag-teaming with me as far as this issue's concerned, 11 but used grease contains contaminants or the wear 12 debris, if you will, and that wear debris takes up the 13 space that you would normally have the oils that are 14 needed to emulsify the grease.

15 So, if you remove the used grease from the acme screw and then put fresh grease on it, there's 16 17 basically more room for that fresh grease to go, and 18 you don't have a lot of space taken up with grease that 19 has more wear debris than it does the characteristics 20 of the lube. You need to get the -- Mr. Epperson also 21 reminds me that in the case of Hawaiian Airlines where 22 we found a grit-lasting medium in there, it sure would 23 be good to get that old grease out which may contain 24 abrasive contaminants, so you can put fresh grease on 25 So, we think that's a good thing to do. it.

EXECUTIVE COURT REPORTERS, INC. (301) 565-0064

We have been told that Boeing is very much strongly considering that in their revised lubrication procedure, and when we talked to other jackscrew assembly or acme screw manufacturers, they also felt that that was prudent.

6 Oh, the -- well, as a matter of fact, Boeing, 7 when they came here to provide a briefing on their revised end-play check, they also showed us a comb, a 8 device that they're trying to field where it's got --9 10 you clamp it right on to the acme screw and the teeth 11 of the comb fit right into the threads and then you 12 rotate the -- you move the comb around and it just 13 scrapes out all that old grease and then you put fresh 14 grease on it. So, they're going to be adopting a 15 procedure like that.

MEMBER GOGLIA: Okay. Now, you mentioned 16 17 everybody that had this feeling that this was better, 18 but there's no testing done that we know of? 19 Testing in regard to? MR. GUZZETTI: 20 MEMBER GOGLIA: Making a determination 21 whether or not, because it's a pretty strong statement 22 here, it'll increase the effectiveness of the 23 lubrication. I happen to agree with that. I'm just 24 challenging you to the -- how did we get there? 25 MR. KOLLY: Yes. We received that guidance

## EXECUTIVE COURT REPORTERS, INC. (301) 565-0064

from jackscrew manufacturers who said one of the most 1 important features of relubrication is in fact removing 2 3 the wear debris from inside the screw threads to allow 4 this fresh grease to now take up the space and provide 5 a reservoir for continuing lubrication during the 6 course of the lubrication interval. So, that's from 7 manufacturers of jackscrews and also in some -- it has to do with purging. Essentially, it's a purging 8 operation. We got into a lot of discussion with grease 9 10 manufacturers and maintenance groups about how you --11 we know that when you purge a system that has a grease 12 fitting, you introduce new grease until the old grease 13 is taken out. That's a standard.

On a screw, on an external screw surface, you don't have a classic purging technique and that's why you would want to use something like this comb and manually remove it, but it's accepted across the industry that when you introduce new lubricant, it's best to remove the most -- as much as you can of the old lubricant.

21 MEMBER GOGLIA: Okay. Thank you.
22 ACTING CHAIRMAN CARMODY: That was 24.
23 25. A larger access panel would facilitate
24 the proper accomplishment of the jackscrew assembly
25 lubrication task.

1 26. If the jackscrew assembly lubrication 2 procedure was a required inspection item for which an 3 inspector's sign-off is needed, the potential for 4 missed or improperly-performed lubrications would be 5 reduced.

6 MEMBER GOGLIA: Question on the word 7 "missed". I read that to mean the card wasn't issued, 8 the task wasn't issued during a maintenance visit. 9 What do you mean by missed? Maybe I should ask you 10 what you mean by it.

11 MR. CLARK: Well, I think the -- what we mean 12 by missed is that somebody tried to lube that and 13 perhaps we would not see the lubrication extruding out 14 of the acme nut or that the screw had not been properly 15 slathered with grease or it had not been done at all. 16 ACTING CHAIRMAN CARMODY: So, you'd say 17 unperformed or improperly performed? Is that what you

18 meant?

19 MR. CLARK: Yes.

20 MEMBER GOGLIA: The role of the inspector at 21 this level, if the card, the task document, was not 22 issued, the inspector has no way of knowing when it's a 23 time-controlled card, like 650 hours. He wouldn't 24 know. So, if it was missed by planning, the inspector 25 wouldn't pick that up.

1 MR. CLARK: No, I understand that. MEMBER GOGLIA: So, that's why the word 2 3 "missed" --4 MR. CLARK: Okay. That's fair. 5 MEMBER GOGLIA: -- raised my attention. We 6 need either another word or actually if we drop the word, then it really addresses the role of the 7 8 inspector. It doesn't address the whole role of the 9 maintenance program. 10 MR. CLARK: Yeah. I think we're good with 11 either way. Unperformed or --12 ACTING CHAIRMAN CARMODY: Unperformed or 13 improperly performed. All right. 14 MR. CLARK: Okay. 15 ACTING CHAIRMAN CARMODY: Okay. 16 MR. CLARK: Super. 17 ACTING CHAIRMAN CARMODY: Okay. 27. Alaska 18 Airlines extension of the end-play check interval 19 allowed the accident acme nut threads to wear to 20 failure without the opportunity for detection and therefore was the direct cause of the excessive wear 21 22 that led to Alaska Airlines Flight 261 accident. The 23 FAA's approval of that extension was a contributing 24 factor. 25 This is one that I'll come back to after we

1 discuss probable cause.

2 MEMBER GOGLIA: I have a couple of words on 3 that, too. 4 ACTING CHAIRMAN CARMODY: Okay. 5 MEMBER GOGLIA: So, bring it back. 6 ACTING CHAIRMAN CARMODY: Okay. All right. 7 28. Alaska Airlines end-play check interval extension should have been but was not supported by 8 adequate technical data to demonstrate that the 9 10 extension would not present a potential hazard. 11 29. The existing process by which 12 manufacturers revise recommended maintenance task intervals and by which airlines establish and revise 13 14 these intervals does not include task-by-task 15 engineering analysis and justification and therefore allows for the possibility of inappropriate interval 16 17 extensions for potentially-critical maintenance items. Because of the possibility that higher-18 30. 19 than-expected wear could cause excessive wear in less than 2,000 flight hours and the additional possibility 20 21 that an end-play check could be missed or improperly 22 performed, the current 2,000 flight-hour end-play check 23 interval specified in Airworthiness Directive 2000-15-24 15 may be inadequate to ensure the safety of the 25 Douglas DC-9, McDonnell-Douglas MD-80/90 and Boeing 717

1 fleet.

18

2 Do you have the same concerns about "missed" 3 in this paragraph? 4 MEMBER GOGLIA: I have concerns about 5 "missed", but I have concerns about the whole paragraph 6 as well. 7 ACTING CHAIRMAN CARMODY: All right. 8 MEMBER GOGLIA: Because, you know, the 2,000 9 flight hours and the 650-hour lubrication intervals 10 with an inspection that's hauled out looking for the 11 debris, looking for shavings in the grease and so on, I 12 think really does increase the probability that any defects will be found, and I can't support this one 13 14 simply. 15 I think that the work that was done by the 16 industry and the FAA in this area is adequate, and I 17 think that we need to defer to their judgment until

19 lubrication visits between a shortened end-play check 20 isn't going to produce satisfactory results. I think 21 it is.

such time as we can show that three additional

DR. ELLINGSTAD: Excuse me, Mr. Goglia. This particular finding addresses the inspection interval and not lubrication by itself, and what I would remind you is what was shown with respect to the failure to

demonstrate reliability and validity for the end-play procedures calls into question the capacity of the available measuring procedures to reliably detect this condition. So, that is coupled with these possibilities of not performing an inspection on those intervals, so which gives rise to the concern about missing significant wear.

8 MEMBER GOGLIA: And I would counter that with 9 the AD note which I might note that I requested from 10 staff and took a rather unusual length of time for 11 something that's referenced in the report so many times 12 to be able to put their hands on to give it to me. But in the AD note that the FAA issued in this area, it 13 14 calls for an intensive visual examination at the grease 15 job which did not exist up until this AD note was 16 issued and they actually give you the detail and what 17 you have to accomplish this inspection. Those are all additional requirements that did not exist at the time 18 19 that this airplane was lubricated and that's the reason 20 why I say that coupled. The two of them are not in a 21 vacuum separately. They're together. You add those 22 together and additionally add the Boeing tool, the new 23 tool, into the mix, and I think that there is the 2,000-hour cycle for end-play checks is a substantial 24 25 improvement, and we don't need this recommendation.

DR. ELLINGSTAD: Well, one additional point that I'd like to make is that in addition to the changes in the end-play procedures that Boeing has developed, there was also, as a focus of our earlier recommendation, a request that that procedure be validated and that the reliability be demonstrated.

Now, we understand that Boeing is in fact
engaged in the study to accomplish that, but we have
not yet seen the results.

10 MR. CLARK: In addition, examining the grease 11 is again not one of those things we would consider a 12 highly-controllable process since that's the kind of thing we think is required for such a critical item, 13 14 and again this goes back to trying to control fatigue 15 and prevent fatigue or catch it before it reaches critical mass requires that highly-controllable 16 17 environment, and we do recognize cutting the inspection intervals down to 2,000 hours is a big bite at that and 18 19 also doing things like examining the grease.

If you find the flakes in there or find something extremely unusual, certainly grounds to pull it off. What we're not convinced of is that are you always going to find something right there when you're doing that or is it always going to get done properly or to a certain level, and can those things get missed,

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and I think that goes back to the comment I made 1 2 earlier that for the system safety-type work or 3 maintainability-type work, I think it's been well 4 established, the number I've been told, I'm not an 5 expert in that area, that maintenance items should be 6 considered an 80-percent reliability level, and so again, this is part of the out of the ordinary is we're 7 8 dealing with this highly-critical system where I think 9 in many other situations we've dealt with in parts 10 failures and that lead to accidents and stuff, that 11 that may be appropriate, but again it's still, we 12 think, better to be cautious, and we haven't asked them 13 to change it, but we want to see the numbers to see 14 that it fully supports this, and if the reliability and 15 the accuracy of these measurements and processes don't 16 get us there, then we may need a shorter number.

17 For example, again we don't know that this 13 18 times wear rate from the grit that showed up in Hawaii 19 Airlines is the worst we can get. It's a number. We 20 know we can get that because we had that at Hawaii. 21 How much worse can it get? So, then if we go back and 22 start looking at we still want to try to have the 23 opportunity for a blown inspection and at least get two shots at it before it fails, that's where our concern 24 25 is. You can get into some high wear rates up in this

Hawaiian number, maybe a little bit greater, and you blow one of those 2,000-hour cycles, you can be in a critical state before you get to the next 2,000-hour cycle. That's a concern we have.

5 MEMBER BLACK: Madam Chairman, we're always 6 saying maybe in here. Maybe we could handle this at 7 the recommendation stage and have them to monitor the performance of the new end-play check and lubrication 8 9 process and report back or something. It might be a 10 way out of this. We're saying it might be. We don't 11 know. And then, if we -- and this is just a finding. 12 Then at the recommendation stage, ask them to monitor 13 it and report back or something of that nature.

We keep talking about Hawaii. How long have they been flying DC-9s out there? This is the first time that happened. How long have they been using that grit stuff?

18 MR. CLARK: As far as we know, they used it 19 one or two times on a couple airplanes back in the tail 20 cone.

21 MEMBER BLACK: That's all we know.

22 MR. CLARK: That's the difficulty when we're 23 dealing with one of these out of 80 million flight 24 hours, it's not just going to show up in the normal 25 course of business. It's --

1 MEMBER BLACK: Well, but Hawaii had had DC-9s 2 a long time. 3 MR. CLARK: Oh, absolutely. Yeah. MEMBER BLACK: And I assume that it had 4 5 corrosion for a long time. So, you know. 6 MR. CLARK: I assume there's a good reason to use the grit back there, that's for sure. 7 8 MEMBER BLACK: Yeah. 9 ACTING CHAIRMAN CARMODY: As I understand it, 10 Member Black has proposed that we strike the Finding 11 and perhaps incorporate another recommendation that 12 would suggest that --MEMBER BLACK: I don't even know that we need 13 14 to strike it. It says may be. 15 ACTING CHAIRMAN CARMODY: Well, I would leave 16 it in, but, I mean, I'm trying to --17 MEMBER BLACK: Then --18 ACTING CHAIRMAN CARMODY: And then, craft a recommendation that would say --19 20 MEMBER BLACK: I think there is a 21 recommendation that says something about it and just 22 handle the recommendation when we get to it. 23 ACTING CHAIRMAN CARMODY: Hm-hmm. 24 MEMBER BLACK: Is that okay, John? 25 MEMBER GOGLIA: I think so.

1 ACTING CHAIRMAN CARMODY: All right. I'11 2 put a note on 30 as well. 3 MEMBER GOGLIA: Before we move on, Mr. Clark, when this AD note was issued, did we comment on this? 4 5 I don't remember. MR. CLARK: I don't remember. 6 7 MEMBER GOGLIA: Because one of the things 8 that --9 MR. CLARK: I think Jeff just said it was a 10 telegraphic AD and I don't remember. Was it 11 telegraphic? 12 MR. GUZZETTI: The first one was a 13 telegraphic AD that was issued two-three days after the 14 accident and then they simply revised it four or five 15 months later. I don't think -- it was already a final 16 rule. I don't think it was an MPRM. I could be wrong 17 about that, though. MR. CLARK: And I think for what we saw at 18 19 that time, it made sense to us, and it was appropriate. 20 I think we had no objections to it in that sense, 21 whether we commented on it or not. 22 MEMBER GOGLIA: Well, I agree with you. Ι 23 think it was appropriate, but one of the things that 24 you said that had my ears perk up was about the -- in 25 the grease inspections, somebody not identifying what's

in it, and if that's the case, I wanted to know if we were -- if we had responded to this AD, to have chemical analysis done on the grease when we take it, which is routine on oil samples.

5 MR. CLARK: Sure. We didn't do that. Ι 6 think the way I would kind of go back and what was on 7 everybody's mind back then, I probably can't reconstruct that, certainly can't from my own memory, 8 9 but the issue is that that is a good thing to do. It's 10 one way to get at the problem. It's one way to, you 11 know, take an edge off or to have mechanics out there 12 looking. We don't know that that's in one sense 13 reliable enough to get away from escalating from 2,000 14 hours or extending from 2,000 hours what it is now or 15 is it enough not to back off of that 2,000 hours even 16 now. It's still a good thing to do. It's still good 17 practice having the mechanics out there taking every 18 shot they can to take the edge off the risk.

19 MEMBER GOGLIA: Knowledgeable mechanics.

20 MR. CLARK: That's true, too.

21 MEMBER GOGLIA: Okay.

22 ACTING CHAIRMAN CARMODY: All right. Member 23 Hammerschmidt?

24 MEMBER HAMMERSCHMIDT: Are we agreeing to 25 leave it in for the moment?

MEMBER GOGLIA: I think for the time being,
 until we get the recommendations.
 MR. CLARK: Okay.
 ACTING CHAIRMAN CARMODY: I have it circled.

I have a couple of things we'll come back to.

5

6 MEMBER HAMMERSCHMIDT: Well, I might mention 7 that this was really the first conclusion that I put a 8 question mark by, but the two words "may be" softened 9 it, made it enough uncertain --

ACTING CHAIRMAN CARMODY: May be inadequate. MEMBER HAMMERSCHMIDT: So, I mean, we could say may be adequate. It may be inadequate, it may be adequate. I believe that's what Mr. Clark was getting at in your -- whenever I asked you about this earlier on this morning, I believe, that it's just an uncertainty.

17 MR. CLARK: Well, it is right now and part of it is, is that, in where we're at right now, we haven't 18 19 set down and tried to develop very specific -- take a 20 rigorous approach and develop those numbers. That's kind of not the business we're in. Sometimes we sure 21 22 take a try at it to push people the wrong -- force them to take a try, but we haven't done that in this case. 23 ACTING CHAIRMAN CARMODY: Okay. 31. 24 The 25 continued collection and analysis of end-play data are

1 critical to monitoring acme nut thread wear and

2 identifying excessive or unexpected wear rates, trends 3 or anomalies.

4 32. Until August 2000, Alaska Airlines used 5 a fabricating restraining fixture that did not meet 6 Boeing specifications. However, the Safety Board could 7 not determine whether the use of this non-compliant 8 fixture generated an inaccurate end-play measurement 9 during the last end-play check or whether the use of 10 this fixture contributed to the accident.

11 33. The on-wing end-play check procedure, as 12 currently practiced, has not been validated and has low 13 reliability.

14 34. Deficiencies in the overall process
15 increase the likelihood that jackscrew assemblies may
16 be improperly overhauled.

17 35. The absence of a requirement to record 18 or inform customers of the end-play measurement of an 19 overhauled jackscrew assembly could result in an 20 operator unknowingly returning a jackscrew assembly to 21 service with the higher-than-expected end-play 22 measurement.

36. Operators will maximize the usefulness
of end-play measurements and wear rate calculations by
recording on-wing end-play measurements whenever a

jackscrew assembly is replaced on an airplane. 1 37. Because the jackscrew assembly is an 2 3 integral and essential part of the horizontal stabilizer trim system, a critical flight system, it is 4 5 important to ensure that maintenance facilities 6 authorized to overhaul these assemblies possess the 7 proper gualifications and equipment. 8 38. 9 MEMBER GOGLIA: Mr. Clark, what about adding 10 manuals here? 11 MR. CLARK: I put documentation. I just penciled in documentation, manuals. 12 MEMBER GOGLIA: Documentation is fine. 13 14 MR. CLARK: Okay. 15 MEMBER GOGLIA: Instructions for continued airworthiness. Use the FAA's terms. 16 17 ACTING CHAIRMAN CARMODY: What are we saying? Possess the proper qualifications, equipment and? 18 19 MEMBER GOGLIA: Instructions for continued 20 airworthiness. 21 ACTING CHAIRMAN CARMODY: Okay. 22 MR. CLARK: Okay. Usually -- I don't like to 23 get into their term of art because that forces us to 24 kind of weave our way through their terms and 25 regulations. If we just get back and say

1 documentation, then we can --

2 ACTING CHAIRMAN CARMODY: Okay. 3 MR. CLARK: Is that all right? MEMBER GOGLIA: That's fine. 4 5 MR. CLARK: Okay. 6 ACTING CHAIRMAN CARMODY: Okay. We're adding 7 and documentation to Number 37. All right. 8 The dual-thread design of the acme screw 38. and nut does not provide redundancy with regard to 9 10 wear. 11 39. The design of the Douglas DC-9, 12 McDonnell-Douglas MD-80/90, and Boeing 717 horizontal stabilizer jackscrew assembly did not account for the 13 14 loss of the acme nut threads as a catastrophic single-15 point failure mode. The absence of a fail-safe 16 mechanism to prevent the catastrophic effects of total 17 acme nut thread loss contributed to the Alaska Airlines Flight 261 accident. 18 19 Now, this is another one that relates to the 20 probable cause. Do we want to go back to this after we 21 go to probable cause? All right. 2.2 40. 23 MEMBER BLACK: Well, if we were going to 24 interject, John, a finding with regard to Jeff's other 25 aircraft systems, probably somewhere in this vicinity

1 would be the place to do it.

2 MR. CLARK: Yeah. The findings, we usually 3 take in the words that were developed in the analysis and wherever we would put that would fall out. I 4 5 assume it would fall right here, but --6 MEMBER BLACK: Okay. Wherever. Let's just 7 not forget it. 8 MR. CLARK: Okay. But I agree with you. It 9 most likely will fall somewhere close here. 10 MEMBER BLACK: Okay. Good. 11 MR. CLARK: The only other problem it could be is that it may be easier to put it in a separate 12 13 section right at the very end and address that issue in 14 its entirety by itself, so then it would fall later. 15 MEMBER BLACK: Okay. 16 ACTING CHAIRMAN CARMODY: So, do we have a 17 proposal for a new finding or what? 18 MEMBER BLACK: Not yet. 19 ACTING CHAIRMAN CARMODY: Not yet. All 20 right. 21 40. When a failure could have catastrophic 22 results, it is not appropriate to rely on maintenance 23 and inspection intervention to prevent the failure from occurring if a practicable design alternative could 24 25 eliminate the catastrophic effects of the failure mode.

1 MEMBER GOGLIA: Don't -- go on. Do I count 2 to 10? 3 MEMBER BLACK: Well. ACTING CHAIRMAN CARMODY: Well, what is the 4 5 6 MEMBER GOGLIA: We have to rely upon the 7 entire system. It's the design, it's the operation, and it's the maintenance and inspection process. 8 That statement is -- the word "inappropriate" and the words 9 10 on either side of it, they are not appropriate. That 11 whole aviation system as well as other modes of 12 transportation, even the elevators that we rode up and 13 down in today in this building, they all rely upon 14 maintenance. If you don't maintain it, the outcome is 15 certain. So, I mean, I just --16 MR. CLARK: Well, the -- you're seeing 17 something different in this than I am because we're not 18 -- maintenance is absolutely critical out there and 19 they need to perform well, and I think you just made a comment a moment ago about properly-trained and

20 comment a moment ago about properly-trained and 21 properly-qualified mechanics. They aren't out there. 22 There are those that aren't properly trained or 23 properly qualified and we have our overseas operations 24 where they don't have the opportunity to reach the 25 skills that our United States mechanics do perhaps, and

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so this in no way means to take away from the critical 1 2 responsibility that maintenance has, but when there is 3 -- I would offer a slight analogy that we expect pilots out there to be professional and do their jobs, but 4 5 CFIT is one of the worse situations going. So, we put 6 other instruments in there to help them evaluate the situation better and to help them use the instruments 7 8 that they have better to try to mitigate those kinds of 9 risks.

10 I see what we're doing here is that 11 maintenance needs to be doing their job, first and 12 foremost, every time. What we're saying here is that 13 in those areas that are so critical, if we can go in 14 there and buy that safety margin, then we ought to do it, and if it's something like a fan disk where we 15 16 cannot contain it if it ruptures, then we better take 17 other actions, but we're looking for a practical 18 solution here to buy that margin for the maintenance 19 side and that's all we're saying.

ACTING CHAIRMAN CARMODY: Maybe I could suggest something where we eliminate some of the language that disturbs Member Goglia. Maybe we could say when a failure could have catastrophic results, it may be appropriate to consider a practicable design alternative to eliminate the catastrophic effects of

1 the failure mode.

2 MEMBER GOGLIA: That's fine with me. 3 ACTING CHAIRMAN CARMODY: Would that be all 4 right? 5 MR. CLARK: Well, I would consider for that 6 one, it's almost mandatory to consider. It's not It is mandatory to consider and if we can --7 mavbe. 8 ACTING CHAIRMAN CARMODY: So it doesn't get 9 us anything. MR. CLARK: Well, no. I think to say that it 10 11 is mandatory to consider and that's all we're doing 12 here. What can we do in a practical way to buy that

13 margin for that mechanic and that's no different than 14 what we try to do in a practical way in buying margins 15 for the pilots in all different phases of their flight 16 operations.

MEMBER GOGLIA: You're talking about a systemic approach but that's not how it's worded here. Can we -- I don't want to bog us down here. Can we take this one, Number 40, and put it in the same place that we put Number 17 where we work on some additional language and circulate it?

23 ACTING CHAIRMAN CARMODY: Sure.

24 MR. CLARK: When we start that, somebody 25 offered up that right at that first line, it says it's

not appropriate to rely solely upon, and I think that 1 doesn't quite fix everything I know you're after, but 2 3 that is the issue. It's not just maintenance. Why stick it all to them if we can find other ways to get 4 5 us off the --6 ACTING CHAIRMAN CARMODY: Okay. 7 MR. CLARK: -- same --MEMBER BLACK: Would solely work, John? I 8 9 mean, it sounds okay to me. 10 MEMBER GOGLIA: It does sound -- let's just 11 move it. We can deal with this later. 12 ACTING CHAIRMAN CARMODY: All right. Well, 13 let's perfect some language on that one, if you will. 14 Douglas DC-9, McDonnell-Douglas MD-41. 15 80/90, and Boeing 717 series airplanes should be modified to ensure that loss of the horizontal 16 17 stabilizer trim system jackscrew assembly acme nut 18 threads does not preclude continued safe flight and 19 landing. 20 MEMBER GOGLIA: This one begs the question, 21 what about the rest of the fleet? 22 MR. CLARK: We agree, and that's what we talked about, that we hadn't progressed far enough in 23 developing Jeff's whole factual analysis and he had a 24 25 proposed recommendation on ball screws, and I think

that we talked to Member Black a little bit about kind of detuning that a little bit, just basically going to get a study going of all of those systems out there and make sure we don't have a lingering or a potential failure mode like we saw here due to wear specifically and any other thing they may find while they're looking at it.

8 So, I think that's something that Member 9 Black had put together perhaps for a follow-on.

10ACTING CHAIRMAN CARMODY: Do we want to take11up your suggestions at this point, George?

12 MEMBER BLACK: I don't know. This is the 13 thing John and I have been talking about, when to put 14 in, for quite some time, and --

ACTING CHAIRMAN CARMODY: Well, maybe we should finish -- go down through 45 and then return to these because I know you had some amendments to these conclusions and it might be a good time to take them up. Would that be reasonable? Let's do that.

20 MEMBER BLACK: Yeah. I think this one's 21 going to be difficult, though.

ACTING CHAIRMAN CARMODY: All right. Well, we're circling 41 to return to, right?

24 MEMBER GOGLIA: Hm-hmm.

25 ACTING CHAIRMAN CARMODY: Okay. I hope

1 somebody's keeping track of all these. Good.

42. Catastrophic single-point failure modes
should be prohibited in the design of all future
airplanes with horizontal stabilizer trim systems,
regardless of whether any element of that system is
considered structure rather than system or is otherwise
considered exempt from certification standards for
systems.

9 43. The certification requirements 10 applicable to transport category airplanes should fully 11 consider and address the consequences of failures 12 resulting from wear.

44. At the time of the Flight 261 accident,
Alaska Airlines Maintenance Program had widespread
systemic deficiencies, some of which apparently still
have not been corrected.

17 45. The FAA did not fulfill its 18 responsibility to properly oversee the maintenance 19 operations at Alaska Airlines, and at the time of the 20 Alaska Airlines Flight 261 accident, FAA surveillance 21 of Alaska Airlines had been deficient for several 22 years.

So, that completes the draft of theConclusions.

25 Now, do we want to move on to the Probable

Cause and then return to Conclusions later? Would that 1 2 make sense or do you want to take up your Conclusions? 3 MEMBER BLACK: From a logical sense, it doesn't make sense. 4 5 ACTING CHAIRMAN CARMODY: Well, we're split 6 here. I mean, we have some conclusions that kind of 7 hinge on the probable cause. We have others that do 8 not. 9 MEMBER BLACK: It's all right to discuss it. 10 It doesn't -- I mean, we already have a framework we're working on. So, I suppose it makes sense. 11 12 ACTING CHAIRMAN CARMODY: The Probable Cause? 13 MEMBER BLACK: Right. 14 ACTING CHAIRMAN CARMODY: Well, I will read the Draft Probable Cause and then I have a proposed 15 revision, and I'm sure others do as well. So, let me 16 17 read the draft first. 18 The National Transportation Safety Board 19 determines the probable cause of this accident was a 20 loss of airplane pitch control resulting from in-flight 21 failure of the horizontal stabilizer trim system 22 jackscrew assembly acme nut threads. The thread failure was caused by excessive wear resulting from (1) 23 Alaska Airlines insufficient lubrication of the 24 25 jackscrew assembly, (2) Alaska Airlines extended

1 lubrication interval which increased the likelihood 2 that a missed or inadequate lubrication would result in 3 excessive wear of the acme nut threats, and (3) Alaska 4 Airlines extended end-play check interval which allowed 5 the excessive wear of the acme nut threads to progress 6 to failure without the opportunity for detection.

7 Contributing to the accident was (1) the 8 FAA's acceptance of Alaska Airlines extended 9 lubrication interval and the FAA's approval of Alaska 10 Airlines extended end-play check interval, and (2) the 11 absence on the MD-80 of a fail-safe mechanism to 12 prevent the catastrophic effects of total acme nut 13 thread loss.

Now, I will take the liberty of reading my
proposal and then I know Member Black has one and we'll
see.

17 Probable Cause. The National Transportation 18 Safety Board determines that the probable cause of this 19 accident was the loss of airplane pitch control 20 resulting from the in-flight failure of the horizontal 21 stabilizer trim system jackscrew assembly acme nut 2.2 threads. That's the same as the original one. 23 The thread failure was caused by excessive wear resulting from (1) Alaska Airlines insufficient 24 25 lubrication of the jackscrew assembly, (2) Alaska

Airlines extended lubrication interval which increased 1 the likelihood that a missed or inadequate lubrication 2 3 would result in excessive wear of the acme nut threads and the FAA's approval of Alaska Airlines extended 4 5 lubrication interval, and (3) Alaska Airlines extended 6 end-play check interval which allowed the excessive 7 wear of the acme nut threads to progress to failure without the opportunity for detection and the FAA's 8 9 approval of Alaska Airlines extended end-play check 10 interval.

11 Contributing to the accident was the absence 12 on the MD-80 of a fail-safe mechanism to prevent the 13 catastrophic effects of total acme nut thread loss.

14 What my proposal does, it retains the same 15 language as the draft, but it essentially moves the FAA 16 up to make them one of the -- along with Alaska 17 Airlines the cause of the accident as opposed to 18 contributing, and the reason I think this is important 19 is that the FAA is the government and I think the 20 public trusts the government to assure the safety of 21 flight. The public pays the FAA. The public has faith in the FAA to do this, and I feel in this instance, the 22 23 FAA failed miserably in the oversight of Alaska Airlines. 24

25 So, while certainly Alaska Airlines is --

ACTING CHAIRMAN CARMODY: While I think Alaska Airlines has a heavy responsibility, a primary responsibility to enforce the regulations, I don't think that the FAA's role is any less crucial nor do I think they should be seen as contributing. I think they were causal. That's my view, and I wanted to say that.

9

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#### Member Black?

(Applause)

10 MEMBER BLACK: Well, as you know, I've had 11 this written both ways. I had it written almost 12 identically to that and then I have another option here, and I guess that is the -- you well stated the 13 14 fundamental question. We in government, and I used to be in the local government where I had inspectors 15 16 working for me on the roadway system and the people who 17 paid my salary and their salary expected those people 18 to produce a safe roadway system, and if we didn't, we 19 were certainly held accountable for it, and it -- I 20 mentioned during the meeting they were -- actually had intensive scrutiny of this airline going on as this 21 22 airplane, the accident airplane, was proceeding through 23 its course to its ultimate destiny, and it was not caught, and I don't know why. I don't think anybody 24 25 will ever know really why, but it's just a question of

1 how you weigh this out, and I see that it can be argued 2 either way.

3 There's also another one that is around that basically, I guess I could read that I wrote once that 4 5 says, the National Transportation Safety Board 6 determines the probable cause of this accident to be a 7 loss of airplane pitch control resulting from the inflight failure of the horizontal stabilizer trim system 8 jackscrew assembly acme nut threads. The thread 9 10 failure was caused by excessive wear resulting from 11 Alaska Airlines insufficient lubrication of the 12 jackscrew assembly.

This particular addition then moves to 13 14 contributing. Contributing to the accident were (1) 15 Alaska Airlines extended lubrication interval and the 16 FAA's approval and/or acceptance, whatever the proper 17 word is, of that extension which increased the 18 likelihood that a missed or inadequate lubrication 19 would result in excessive wear of the acme nut threads, 20 and (2) Alaska Airlines extension of the end-play check 21 interval and the FAA's approval or acceptance of that 2.2 extension which allowed the excessive wear of the acme nut threads to progress to failure without proper 23 24 opportunity for detection, and I also had as a separate 25 paragraph, contributing also to it was the absence of

1 the MD-80 -- on the MD-80 of a fail-safe mechanism to 2 prevent catastrophic effects of total acme nut thread 3 loss.

4 That one was similar to an earlier staff 5 draft, I believe, was it not, John?

6 MR. CLARK: Yeah. We had one similar around 7 the director's review similar to that.

8 ACTING CHAIRMAN CARMODY: Are there other 9 views? Member Goglia, you were expressing something to 10 me just now.

MEMBER GOGLIA: I actually like what Member Black has proposed, and if we merge some of what you said and dropped "contributing" in the second paragraph of what you were reading and just listed all as part of the probable cause, and --

ACTING CHAIRMAN CARMODY: Okay. Would you
 make -- yeah. Has the same practical effect of mine.

18 MEMBER GOGLIA: Right.

19 ACTING CHAIRMAN CARMODY: Hm-hmm.

20 MEMBER GOGLIA: It flows better.

21 ACTING CHAIRMAN CARMODY: It's just different

22 language.

23 MEMBER BLACK: Okay. I'm certainly --

24 engineers are notoriously illiterate.

25 MEMBER GOGLIA: No, good.

1 ACTING CHAIRMAN CARMODY: No, no.

2 MR. CLARK: John, one thing. The -- as we've 3 tried to develop this, the one that -- when we put it up, we were trying to put, even though it's a factor on 4 5 this -- on the design, that we were trying to separate 6 it to some extent from the others, and I commented 7 about that earlier, that it's -- so, anyway, that was one part of what we were trying to do, is get a little 8 9 separation in there, that it's an issue. It's 10 something we need to deal with or, you now, we think 11 people need to be aware of, but it didn't measure up in a sense to the others. So, there's -- that's one 12 13 reason we ended up the way we did.

MEMBER GOGLIA: John, we talk here and we've talked a lot today about the fail-safe mechanisms for these screws, but we haven't even mentioned at all whether or not this technology was available at the time the airplane was certified, and one of the things that we do very well is hold airplanes that have been designed a long time ago to today's standards.

Do we know anything in that area? What was available?

23 MR. CLARK: No, I really don't. What we know 24 is there's nothing available for this jackscrew right 25 now, but I think the -- starting off with the clean

sheet of paper, that if one of the design goals is to accept that that thing would wear out, wear completely through and then what would be the consequences, we may have seen a different design. We don't know what we would have seen, but the concept could have been on the table at that time to think of it in that terms.

Now, whether it would -- I don't know. 7 Tt. 8 seems to me that jackscrews have probably been around a 9 heck of a lot longer than airplanes, and so is there 10 something out there, something that could have been 11 added, it would surprise me if there wasn't, but it 12 still could have -- the same engineering effort could 13 have been put in then that we would like to see as an 14 attempt right now. It may have been easier then. Ι mean, what we're trying to do now is go back and 15 16 accommodate an existing design and enhance it where, when you start off with a clean sheet of paper with 17 that design goal in mind, it's a lot easier to 18 19 incorporate whatever needed to be incorporated.

20 MEMBER GOGLIA: I tend to think, given the 21 work that NASA's done, that maybe there wasn't anything 22 out there.

23 MR. CLARK: That would surprise me if there24 wasn't. I would -- but it could be.

25 ACTING CHAIRMAN CARMODY: Member

1 Hammerschmidt, did you have a comment?

MEMBER HAMMERSCHMIDT: Well, I was just going 2 3 to say that I think we're achieving a consensus here. I mentioned to Member Black prior to the meeting even 4 5 that I thought he had come up with a good alternate 6 probable cause statement. The only improvement I would 7 offer is concerning the last sentence, the one that we've been stating, contributing also to the cause was 8 the absence of the MD-80, on the MD-80, of the fail-9 10 safe mechanism to prevent the catastrophic effects of 11 total acme nut thread loss, and we've discussed that at length today. 12

13 I'm not sure that that's really part of the 14 cause of this accident as a causal element.

15 MEMBER BLACK: It's an interesting point. It certainly is true if there had been something there, 16 17 the accident wouldn't have happened, but it was not --18 I don't know whether -- are we saying yes or no at the 19 time this airplane was certified, that it should have 20 been there in our reading of the -- that was the Civil 21 Aviation Regulations then. Should it have had the -the DC-9 have had a fail-safe device? 2.2

ACTING CHAIRMAN CARMODY: I don't know if it makes sense to go back and say what it should have had when it was certified.

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MEMBER BLACK: Well, it certainly --

ACTING CHAIRMAN CARMODY: I think it makes sense -- it makes sense to observe that it was a causal factor or a contributing factor. It was.

5 MR. CLARK: I don't -- like I said, that had 6 been the design thought or design requirement to take 7 that on at that time and consider that --

8 MEMBER BLACK: Well, --

1

9 MR. CLARK: Well, what I would say is that 10 they did put dual redundancy in there in many places in 11 that. They put the torque tube inside of the 12 jackscrew. So, they put the dual threads on. So, they 13 were absolutely thinking about putting in dual-load 14 paths for structure and which is good, I mean, and we 15 believe that was there. It was the wear thing that 16 slipped through. So, should it have been considered 17 then? I don't know, but the fact -- we're dealing more 18 now with what is right now.

MEMBER BLACK: Well, of course, certainly it was a hard time item when it was first designed, a life item it's called here. In other words, they were going to change it out. They said its life was X, whatever it was, 30,000 hours.

24 MR. CLARK: 30,000. It wouldn't make that. 25 So, they backed off and, of course, this one made it no

1 where near 30,000 hours.

2 ACTING CHAIRMAN CARMODY: Well, let me just 3 clarify what we agree on. It seems to me this 4 formulation -- we agreed to strike the first 5 "contributing to the accident" which is the top of that 6 second paragraph. 7 MEMBER GOGLIA: And roll it together. 8 ACTING CHAIRMAN CARMODY: And roll it 9 together. Shall I read it? Maybe I should read it so 10 we know what we have. 11 The NTSB determines that the probable cause 12 of this accident was the loss -- yes? Slowly. Was the loss of airplane pitch control resulting from the in-13 14 flight failure of the horizontal stabilizer trim system 15 jackscrew assembly acme nut threads. The thread 16 failure was caused by excessive wear resulting from Alaska Airlines insufficient lubrication of the 17 18 jackscrew assembly. 19 MEMBER GOGLIA: 2. 20 ACTING CHAIRMAN CARMODY: I'm sorry. 21 MEMBER GOGLIA: That was 1. 2.2 ACTING CHAIRMAN CARMODY: That was 1. Yeah. 23 You're right. 24 MEMBER GOGLIA: And jump on to 2. 25 ACTING CHAIRMAN CARMODY: 2. Thank you, EXECUTIVE COURT REPORTERS, INC.

John. Alaska Airlines extended lubrication interval 1 2 and the FAA's approval of that extension which 3 increased the likelihood that a missed or inadequate lubrication would result in excessive wear of the acme 4 5 nut threads, and 3. I guess this is, Alaska Airlines 6 extended end-play check interval and the FAA's approval of that extension which allowed the excessive wear of 7 8 the acme nut threads to progress to failure without the 9 opportunity for detection.

10 Now, the remaining paragraph is the one 11 contributing about the fail-safe mechanism, and I still 12 don't have a clear idea of where we are on that. MEMBER GOGLIA: I'd like to drop that. 13 14 ACTING CHAIRMAN CARMODY: I think it's a 15 statement of what occurred in this accident. Now, I think we can look at recommendations and modify those 16 in some way, if that's an issue, but I think to say 17 that this wasn't even a factor in the accident is 18 denying what seems to be the case. 19

20 I'm sorry. We're going to have just the 21 people on the stage talking.

Any other thoughts, Member Black, MemberHammerschmidt?

24 MR. CLARK: Microphone.

25 MEMBER BLACK: Well, it's certainly a true

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statement, but I guess there was a reason I asked about history because whether it's contributing was whether it was required in the first place. If it wasn't required to be in the series, it's sort of a moot point.

6 ACTING CHAIRMAN CARMODY: No, it's not. 7 MR. CLARK: What was required, they did go to 8 the effort to put the redundancy in many areas and this 9 one -- we heard at the hearing was that, you know, 10 there was debate whether it was a system or a structure 11 and certain parts were considered systems, certain 12 parts were considered structure, and wear in and of itself wasn't considered at all in the failure mode. 13 14 So, was it specifically required? Perhaps not because 15 that's why we're making some specific recommendations in that area, but should it have been? We think 16 17 so. 18 MEMBER BLACK: That's fair enough. Thank 19 you. 20 MEMBER GOGLIA: Mr. Guzzetti? 21 MR. GUZZETTI: I just wanted to offer an 22 unsolicited comment, but even though I express my 23 uncomfortableness regarding the recommendation, 24 Recommendation 13, I'm not uncomfortable at all with 25 placing this as a contributing factor in this report.

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As long as I've been writing proposed probable causes, in my mind, a contributing factor is something that if it was there, the accident wouldn't have occurred, and if this jackscrew assembly would have had some sort of mitigating device that would have handled the catastrophic effects of total acme nut thread loss, this accident wouldn't have happened.

8 So, I think that's a pretty compelling case 9 to at least make it -- well, to make it a contributing 10 factor, certainly not causal but contributing, and 11 that's coming from a person that is uncomfortable with 12 making a recommendation in that regard. So, I just 13 wanted to offer that.

ACTING CHAIRMAN CARMODY: That goes to my point, Mr. Guzzetti, that I think the recommendations we can discuss, but I think this really needs to be in because it is what happened and it reflects this accident and that's what we're addressing here today.

MEMBER GOGLIA: Let me -- thinking out loud here. What's missing was a requirement to have a failsafe mechanism and that requirement transcends MD-80s, although we're focused here on the MD-80.

23 MR. GUZZETTI: Actually, Member Goglia, there 24 was a requirement, it wasn't this 1309 10 to the minus 25 9th, but there was a CAR 4b, I think it was. Back

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then, it was -- just one moment here. 4b.606, 1 2 Equipment Systems and Installations, and basically it 3 said all equipment systems and installations shall be 4 designed to safeguard against hazards to the airplane 5 in the event of their malfunctioning or failure, and I 6 think it even went on to state something regarding 7 single-point failures. I'm trying to find it right now, but there was a requirement back then. It just 8 wasn't as embellished and as detailed as the 9 10 replacement requirement which was FAR Part 25-1309. 11 So, I just wanted to make that clear. It just made 12 reference to a probable -- any probable single-point 13 failure.

14 The interpretation, Boeing interpreted --15 they didn't feel it was probable to have a complete wear-out of the entire acme nut threads. They felt 16 17 that the system was so robust, that you didn't even 18 have to go there and be concerned about wear because 19 even if you wore down 90 percent of the threads, you 20 were still well above the safety margin, the structural 21 safety margin.

22 What they did not consider was some mechanism 23 where you could actually wear them all out.

24 MEMBER GOGLIA: Somebody totally disregarding 25 the instruction for continued airworthiness and not

performing maintenance in any meaningful way over an 1 extended period of time that led to the failure. 2 3 (Applause) 4 MEMBER GOGLIA: And I don't know how you 5 could design any mechanical system to take that into 6 effect. 7 MEMBER HAMMERSCHMIDT: Mr. Guzzetti, where is the information in the report that you just referenced? 8 9 MR. GUZZETTI: Page 41 of the factual report. 10 MEMBER HAMMERSCHMIDT: 41. Okay. This is a 11 315-page tome. So, it's hard to --12 MEMBER GOGLIA: Don't forget all the 13 submissions. 14 MEMBER HAMMERSCHMIDT: Yes. 15 (Pause) MR. GUZZETTI: Actually, if I could just 16 point out on the bottom of Page 39 is what I was trying 17 18 to grapple for. It's CAR Section 4b.320(d), and it 19 says, "Control Systems. Each adjustable stabilizer 20 must have a means to allow any adjustment necessary for 21 continued safety of flight after the occurrence of any 22 reasonably-probable single-failure of the actuating 23 system." Now, this kind of goes into the whole 24 25 argument about system versus structure. The FAA

testified that they didn't consider the acme nut as a 1 2 system, they considered it structure which falls under 3 this other regulation. Well, of course, staff vehemently disagreed with that and we felt that this 4 5 control systems should have been considered, but the 6 regulations were such that they were interpreted that it wasn't very clear. So, I just wanted to point that 7 8 out.

9 MEMBER HAMMERSCHMIDT: Well, the reason I had 10 asked is because I actually had highlighted something 11 on this page, and I forgot what page it was in the 12 factual part of the report. So, that answers that 13 guestion.

14 ACTING CHAIRMAN CARMODY: Are there other 15 comments on this?

16 (No response)

ACTING CHAIRMAN CARMODY: Are we ready to come to a decision about this? Do we need to have a break and a little more time?

20 MEMBER GOGLIA: Take a break.

ACTING CHAIRMAN CARMODY: Let's take a break.
Come back in 10 minutes, please.

23 (Whereupon, a recess was taken.)

24 ACTING CHAIRMAN CARMODY: Let's take our

25 seats, please. I'd like to get started again.

I think there have been a number of formulations suggested. I think Member Black has one more. So, let's ask you to read that, please. MEMBER BLACK: Okay. If I can read through my strike-throughs, and I would like to ask counsel or someone first, is it approval or acceptance is the

7 proper word?

8 MR. BATTOCCHI: If you look at the original 9 draft, it makes a distinction between approval and 10 acceptance. For purposes of FAA's rules, there is a 11 distinction. I don't know that the Board needs to feel 12 bound by that, but the FAA does differentiate between 13 acceptance and approval. They use approval when 14 they're looking for formal written blessing to 15 something as opposed to acceptance which may be silent acquiescence. So, there is a distinction within the 16 17 regulatory framework for approval and acceptance, and 18 again, I don't think the Board needs to feel bound by 19 it if it's using approval in a broader sense, but there 20 is a distinction.

21 MEMBER BLACK: I guess I don't know which one 22 to read now. I've got both.

23 MEMBER GOGLIA: We probably should read it 24 acceptance.

25 MR. BATTOCCHI: On the way the original was

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drafted, the end-play check is approval, and the - ACTING CHAIRMAN CARMODY: Lubrication is
 acceptance.

4 MR. BATTOCCHI: -- extended lubrication was 5 approval rather, and the end-play -- I'm sorry. The 6 acceptance was the lubrication interval, and the end-7 play check was approval.

8 MEMBER BLACK: Okay.

9 MR. BATTOCCHI: Okay.

MR. CLARK: But we've gone through that a lot. That's the way it was originally written, but there is the global sense of approval, and I'm going to talk until I get in trouble, then Frank's going to be helping me out here.

15 On the escalation of the lubrication 16 interval, there are specific requirements in there that 17 are maintenance tasks, if they extend 10 percent, 18 requires an approval. It can be accepted if it's less 19 than 10 percent, but if it's greater than the 20 manufacturing recommended interval, and it exceeds 10 21 percent, it requires approval.

Now, in this case, the manufacturing recommended value was 3,600 hours which was greater than 2,700. So, in that sense, it wouldn't require an acceptance, but that 3,600 came from an MSG-3 program,

and they were operating on the MSG-2 program. Somebody 1 had to allow them to use the MSG-3. So, I think with 2 3 all of that going on, they -- somewhere, there had to 4 have been approval to work their way into that 5 situation, but that whole situation, each step, I'm not 6 clear. 7 ACTING CHAIRMAN CARMODY: Does it matter a 8 lot? 9 MEMBER BLACK: Does it matter? 10 ACTING CHAIRMAN CARMODY: I think it's a 11 distinction with no difference. 12 MEMBER BLACK: Okay. Let's make them both --13 MR. CLARK: You're certainly free to use 14 approval for both. ACTING CHAIRMAN CARMODY: All right. 15 16 MEMBER BLACK: Thank you. 17 If I might, Madam Chairman? The National 18 Transportation Safety Board determines that the 19 probable cause of this accident was a loss of airplane 20 pitch control resulting from the in-flight failure of 21 the horizontal stabilizer trim system. I probably have 22 a typo here. Horizontal stabilizer trim system 23 jackscrew assembly acme nut threads. The thread 24 failure was caused by an excessive wear resulting from 25 Alaska Airlines insufficient lubrication of the

1 jackscrew assembly.

Contributing to the accident were: 2 (1)3 Alaska Airlines extended lubrication interval and the FAA's approval of that extension which increased the 4 5 likelihood that a missed or inadequate lubrication 6 would result in excessive wear of the acme nut threads, 7 (2) Alaska Airlines extension of the end-play check interval and the FAA's approval of that extension which 8 allowed the excessive wear rate of the acme nut threads 9 10 to progress to failure without opportunity for 11 detection. 12 Contributing also was the absence on the MD-13 80 of a fail-safe mechanism to prevent the catastrophic 14 effects of total acme nut thread loss. ACTING CHAIRMAN CARMODY: Thank you, Member 15 16 Black. 17 May I have a motion to adopt? 18 MEMBER BLACK: So moved. 19 ACTING CHAIRMAN CARMODY: And a second? 20 MEMBER HAMMERSCHMIDT: Second. 21 ACTING CHAIRMAN CARMODY: All in favor, say 22 aye. 23 (Chorus of ayes) 24 ACTING CHAIRMAN CARMODY: Opposed? 25 (No response)

1 ACTING CHAIRMAN CARMODY: Unanimously 2 carried. 3 Thank you for your cooperation on that. 4 (Applause) 5 ACTING CHAIRMAN CARMODY: Thank you. I know 6 you all are interested. I'm going to have to ask you 7 to hold your applause and let us have quiet because we 8 have to proceed with our work. 9 Shall we go now to the Recommendations? Yes, 10 Member Goglia? Good idea. Why don't we go clean up 11 the Conclusions first since there were a number of 12 those that were dependent on our action on the Probable Cause? All right. 13 14 MEMBER GOGLIA: 23. 15 ACTING CHAIRMAN CARMODY: 23. 16 MEMBER BLACK: Well, someone is supposed to 17 be getting us wording on 17. 18 ACTING CHAIRMAN CARMODY: That's true. Well, 19 17 may not be complete yet. So, 23 can stay as it is, 20 I quess. 21 MEMBER GOGLIA: 17 and 40 were -- we held for 2.2 redraft. 23 ACTING CHAIRMAN CARMODY: Hm-hmm. 24 MEMBER GOGLIA: 23 was the first we turned 25 to.

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ACTING CHAIRMAN CARMODY: Yeah. But that was 1 -- that's moot. So, we don't need -- and 27 was -- can 2 3 stay as it is. I have 30. 4 Yes, Dan? 5 MR. CAMPBELL: Madam Chairman, 23, when you 6 say stays as it is, I believe that you had suggested a modification as the last sentence there was FAA's 7 8 contributing. So, you mean stay as it is modified as earlier suggested. 9 10 ACTING CHAIRMAN CARMODY: No. Stays as it is here because of what we did in Probable Cause. 11 12 MR. CAMPBELL: Well, microphone. ACTING CHAIRMAN CARMODY: Sorry. Stay as it 13 14 is written because of how we handled the Probable 15 Cause. 16 MR. CAMPBELL: As written, it has the Federal 17 Aviation Administration as a contributing factor. ACTING CHAIRMAN CARMODY: I know. That's 18 19 what we just did with the Probable Cause, and the same 20 with 27, and I have 30. Was there going to be -- there 21 was going to be some redrafting on 30 as well, wasn't 2.2 there? 23 MEMBER GOGLIA: Yes. 24 ACTING CHAIRMAN CARMODY: If it's not ready 25 yet, that's fine, but is by chance the redrafting on 30

1 available? No? Okay. Well, we'll catch that later 2 then. Then I have 39.

3 MEMBER GOGLIA: That one's okay, too.
4 ACTING CHAIRMAN CARMODY: That one's okay.
5 All right. Well, I guess we didn't have as much
6 cleaning up as we thought. We still have two
7 outstanding for redrafting.

8 MEMBER GOGLIA: Wait a minute. There's one I 9 would like to --

DR. ELLINGSTAD: Excuse me, Madam Chairman. I believe both 23 and 27 are stated the way that they are written with Alaska as direct cause, and I believe that the Probable Cause that the Board just voted on has Alaska as contributing for both of those rather than as cause.

ACTING CHAIRMAN CARMODY: Well, let's look at the -- well, no. We said the insufficient lubrication, Alaska Airlines insufficient lubrication was the primary. So, that's not inconsistent with what's written on 23.

21 MEMBER BLACK: 27.

ACTING CHAIRMAN CARMODY: I think 23's fine.MEMBER BLACK: 27, no.

ACTING CHAIRMAN CARMODY: I'm sorry? Yes?
MR. CLARK: The intent of putting in -- it

says the -- it says, "Therefore, was a direct cause of 1 2 the excessive wear". That was going to a causal 3 statement rather than --4 ACTING CHAIRMAN CARMODY: Is there a 5 suggestion for change? I'm kind of lost here. 6 MEMBER GOGLIA: We've got to slow down. 7 We've got too much going on. 8 ACTING CHAIRMAN CARMODY: I know. 9 MR. CLARK: I think it'll stay. 10 ACTING CHAIRMAN CARMODY: I thought so. 11 MR. CAMPBELL: Madam Chairman, that 12 conclusion is the extension of the lubrication interval 13 which was then changed to contributing, and in this 14 instance, it is listed as direct. So, to match the 15 Probable, that would be a contributing factor. 16 ACTING CHAIRMAN CARMODY: Okay, okay. Could someone reformulate that for us, please? I take your 17 18 point. And 27, the same, so it matches the Probable 19 Cause. Okay. 20 MR. CLARK: I think one thing we're talking 21 with our writers is that this comment about direct 2.2 cause of excessive wear is in and of itself accurate

and doesn't necessarily go to saying that entire thing

is causal to the accident. It's a direct cause of the

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excessive wear which can be contributing.

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1 MEMBER GOGLIA: Which one are we talking 2 about? 3 MR. CLARK: We're on 23, Line 19, right now, but 27 is the same. 4 5 MEMBER GOGLIA: One at a time. 6 ACTING CHAIRMAN CARMODY: Okay. 7 MEMBER GOGLIA: We got too much. ACTING CHAIRMAN CARMODY: Let me suggest 8 9 something. Since we've agreed on the Probable Cause 10 and we know what that language is, could we ask staff 11 to make recommendations, 23 and 27, consistent with the 12 Probable Cause rather than us doing it here? I think 13 we all know what we intended, but rather than craft it 14 in public, it might be easier if you would redraft 15 those two consistent with the Probable Cause. MR. CLARK: We're working on it now. 16 17 ACTING CHAIRMAN CARMODY: Since you're smarter than we are at this point. Okay. So, that's 18 19 23 and 27. Now, --20 MEMBER GOGLIA: 39 and 41. 21 ACTING CHAIRMAN CARMODY: -- 39. Hmm. Well, 2.2 that's consistent with the Probable Cause. Okay. So, 23 that's okay. All right. And you mentioned 41. 24 MEMBER GOGLIA: And they were going to reword 25 that.

## EXECUTIVE COURT REPORTERS, INC. (301) 565-0064

1 ACTING CHAIRMAN CARMODY: 41 was going to be reworded, is that it? Oh, 40 was going to be reworded. 2 3 MEMBER GOGLIA: 40. You're right. Reading 4 the wrong one. 5 ACTING CHAIRMAN CARMODY: 40. Okay. So, 6 reword 40. 7 MEMBER BLACK: 41 is an independent decision. 8 ACTING CHAIRMAN CARMODY: 41's --9 MEMBER BLACK: Probable Cause. 10 ACTING CHAIRMAN CARMODY: Okay. 11 MEMBER GOGLIA: We're going to fold that into 12 Recommendations. ACTING CHAIRMAN CARMODY: I think you're 13 14 right. All right. So, no. 15 MEMBER GOGLIA: So, 41, we hold. 16 ACTING CHAIRMAN CARMODY: 41, we hold. 23, 27, 39, and 41. 17 18 MEMBER HAMMERSCHMIDT: My memory may be a 19 little short here, but I was thinking that on 41, we 20 had considered maybe substituting all transport 21 category aircraft instead of those models that are 22 listed. I think, wasn't that the option that we were 23 debating over? 24 MEMBER GOGLIA: That's one. 25 ACTING CHAIRMAN CARMODY: I don't know if we EXECUTIVE COURT REPORTERS, INC. (301) 565-0064

1 were agreeing they all should be modified. Maybe they 2 should be --

3 MEMBER GOGLIA: Well, if you say one 4 shipment, --

5 MR. CLARK: I think where we were at on our 6 discussions on that was that we need the -- usually 7 what we do is we identify the model that's particularly a problem and then follow on almost immediately with 8 the second recommendation to do the any and all, check 9 10 the rest of the fleet, and so this finding would be 11 that -- should be modified and then the second -- the 12 next one should be, if that's the appropriate place it 13 falls out, would be some way -- there'd be a finding to 14 address that we have concern about the rest of the 15 fleet or something, and I think Jeff is pretty close to 16 that. Either Jeff or George have the set-up of 17 language for that, for the more --

18ACTING CHAIRMAN CARMODY: You have some19expansive language, Member Black, I do believe.

20 MEMBER BLACK: I do, but I got it from you, 21 John.

ACTING CHAIRMAN CARMODY: All right. Well,
 whoever has it, let's --

24 MR. CLARK: I don't have a copy right now.25 ACTING CHAIRMAN CARMODY: I've got it in

1 front of me. 39. Why don't you -- 40? Here we are. 2 Sorry.

3 MR. CLARK: We did have that in the language on the page changes that came up December 6th. 4 It's 5 the very last page. It says, "Possible new 6 recommendation." It says to add it between 13 and 14, and the text would be, "The Safety Board also believes 7 8 that the FAA should evaluate the horizontal trim system of all transport category airplanes that employ a 9 10 single-actuating assembly to identify any designs that 11 have a catastrophic single-point failure mode and for any such systems identify means to eliminate that 12 catastrophic effect of that single-point failure mode 13 14 and require that such fail-safe mechanisms be 15 incorporated into the design of all existing and future 16 airplanes that are equipped with such horizontal trim 17 systems."

18 ACTING CHAIRMAN CARMODY: Now, you're reading 19 a recommendation.

20 MR. CLARK: Yeah. But the finding could be 21 --

ACTING CHAIRMAN CARMODY: Could be the same.Okay.

24 MR. CLARK: -- very similar.

25 ACTING CHAIRMAN CARMODY: Do we have --

1 MEMBER HAMMERSCHMIDT: I have Member Black's 2 suggestion on Finding 41 that supports the 3 recommendation. I mean, that would be corresponding to the recommendation you were -- do you have this? 4 ACTING CHAIRMAN CARMODY: I don't see that 5 6 that supports what he just said. 7 MEMBER HAMMERSCHMIDT: Okay. 8 MEMBER GOGLIA: In this package? 9 MR. CLARK: What page are we on? 10 MEMBER HAMMERSCHMIDT: 8. 11 MR. CLARK: The -- his 41 is okay in the 12 sense of going global, but it says if found necessary, 13 and of course, we believe that it is necessary for the 14 DC-9 series. So, if that were broken up into two 15 separate ones and leave 41 the way it was and then 16 start in and say -- I would say the if found necessary 17 on other transport category airplanes -- if found necessary, other transport category airplanes should be 18 19 modified to ensure. So, basically break it up into two 20 and keep them separate. 21 MEMBER GOGLIA: I like George's version. 2.2 ACTING CHAIRMAN CARMODY: I think Mr. Clark's point about the if found necessary is important. 23 We should strike that, I think. 24

25 MR. CLARK: Or the other way to do that is do

the DC-9 and other transport category aircraft, if 1 2 necessary. Isolate the if necessary to the other 3 transport categories. 4 ACTING CHAIRMAN CARMODY: Okay. All right. 5 So, Douglas DC-9, McDonnell-Douglas and Boeing 717 6 series airplanes and other transport category aircraft, if necessary. Would that be what you -- or as 7 8 necessary? 9 MR. CLARK: In a sense, that doesn't 10 explicitly isolate the two, but --11 ACTING CHAIRMAN CARMODY: Hm-hmm. 12 MR. CLARK: -- it still -- the language would 13 still incorporate both. 14 ACTING CHAIRMAN CARMODY: Okay. 15 MR. CLARK: Now, you can move the if 16 necessary to the front of that and talk about the DC-9 17 series airplane and, if necessary, other transport 18 category, that would isolate it. 19 ACTING CHAIRMAN CARMODY: Okay. Okay. So, 20 we have one revised 41. 21 MEMBER GOGLIA: We have three versions that 22 he just proposed. 23 ACTING CHAIRMAN CARMODY: Okay. Mr. Clark, 24 would you read your latest proposal and let's see if we 25 can agree on that? 41 as revised, starting with

1 Douglas DC-9, etc.

2	MR. CLARK: 41, I believe we have now, is
3	just a slight modification from the one from Member
4	Black. It says, "Douglas DC-9, McDonnell-Douglas MD-
5	80/90 and Boeing 717 series airplanes and, if found
6	necessary, other transport category aircraft should be
7	modified to ensure that the loss of the horizontal
8	stabilizer trim system jackscrew assembly acme nut
9	threads or other control assembly does not preclude
10	continued safe flight and landing."
11	MEMBER BLACK: You might want to work on the
12	language there because the others don't have acme nuts.
13	Some of them don't.
14	MR. CLARK: Well, okay. We said horizontal
15	trim system acme nut threads or other control assembly.
16	You had that in there.
17	MEMBER BLACK: I put it in, but does that
18	cover it? I mean, is that adequate wording, John?
19	MR. CLARK: Well, we always think so. Now,
20	when we get our responses back from FAA, we're
21	surprised sometimes that we weren't careful enough.
22	ACTING CHAIRMAN CARMODY: Let's assume it
23	does.
24	MR. CLARK: But it makes sense to us right
25	now.

1 ACTING CHAIRMAN CARMODY: It makes sense to 2 me. 3 May I have a motion on -- well, wait a minute. We ought to adopt all of them. So, that's 4 5 revised 41. I think that's the last of the Findings, 6 other than 23, 27 and 40, which are being reworked 7 right now. 8 MR. CLARK: Okay. If we can take on 23 and 9 27, --10 ACTING CHAIRMAN CARMODY: All right. 11 MR. CLARK: Let's see. I've lost my place. 12 ACTING CHAIRMAN CARMODY: Okay. 13 MEMBER GOGLIA: 17. 14 ACTING CHAIRMAN CARMODY: You're right. 15 MEMBER GOGLIA: 17, 40 --16 ACTING CHAIRMAN CARMODY: You're right, 17 you're right. MEMBER GOGLIA: -- are being circulated for 18 19 rewrite. 20 MEMBER BLACK: Circulating? Okay. 21 ACTING CHAIRMAN CARMODY: Yeah. They were 22 going to do it after --23 MR. CLARK: We have a little more concern on 17, but first, on 23, I think we can essentially on the 24 25 top of 23 put in that -- and we talk about Alaska

Airlines extension of the lubrication and the FAA's 1 2 acceptance. Then everything stays the same. Even the 3 word, was a direct cause of the excessive wear that led to the accident, and what we can say was a direct cause 4 5 of the excessive wear and contributed to the accident 6 and that could -- puts the connotation of contributing 7 into --

ACTING CHAIRMAN CARMODY: All right. 9 MR. CLARK: Is the direct cause of the 10 excessive wear and just simply contributed to the --11 ACTING CHAIRMAN CARMODY: All right. 12 MR. CLARK: And then everything else would 13 stay the same, and then basically we have quite a 14 similar situation --

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15 MEMBER GOGLIA: Wait, wait, wait. Don't go 16 on. Read that one to me one time.

17 MR. CLARK: I was going to try to bluff my 18 way through it. All right. The -- okay. Let me see 19 if I have it. Okay.

20 "Alaska Airlines extension of the lubrication 21 interval and FAA's acceptance of the interval extension 22 for its McDonnell-Douglas MD-80 horizontal stabilizer 23 components, the last of which was based on Boeing's extension of the recommended lubrication interval, 24 25 increased the likelihood that a missed or inadequate

lubrication would result in excessive wear of jackscrew 1 assembly acme nut threads and therefore was a direct 2 3 cause of the excessive wear and contributed to the Alaska Airlines Flight 261 accident. 4 5 The Federal Aviation Administration's 6 acceptance of those extensions was a contributing factor." 7 8 ACTING CHAIRMAN CARMODY: Why would you need 9 the last sentence if you have it in the first part? 10 MR. CLARK: I'm sorry. 11 ACTING CHAIRMAN CARMODY: Strike it. 12 MR. CLARK: You're right. 13 ACTING CHAIRMAN CARMODY: Okay. All right. 14 MR. CLARK: Yep. 15 ACTING CHAIRMAN CARMODY: Okay. Because that 16 squares with the Probable Cause, and I think with 27, 17 we can do the same thing. 18 MR. CLARK: Right. 19 ACTING CHAIRMAN CARMODY: Alaska Airlines 20 extension and FAA's approval of that extension allowed 21 the accident, etc., etc. Strike the last sentence. 2.2 MR. CLARK: I said acceptance in 23. I lost 23 Are we going to go with approval in both or -track. 24 ACTING CHAIRMAN CARMODY: Whatever we do, 25 let's just make a decision and go with it.

MR. CLARK: Approval, we believe, is the
 appropriate word.

ACTING CHAIRMAN CARMODY: Okay. Well, I'm
really not of a strong mind on that. All right.
MEMBER GOGLIA: Wait a minute. How is the
extension of the time a cause of excessive wear?
Extension of the end-play check interval was a direct
cause of the excessive wear.
MR. CLARK: Well, you need both a high wear

10 rate and time and the extension of the time allowed the 11 excessive wear to occur.

MEMBER GOGLIA: Read it, John. Let's hear it. Let's hear it. Read it aloud and see if you --14 27.

ACTING CHAIRMAN CARMODY: I can read it, if you'd -- okay.

MR. CLARK: No. I just wanted to add in afew notes here.

19 ACTING CHAIRMAN CARMODY: Okay.

20 MR. CLARK: And okay. "Alaska Airlines 21 extension of the end-play check interval and FAA's 22 approval of the extension allowed the accident acme nut 23 threads to wear to failure without the opportunity for 24 detection and therefore was a direct cause of the 25 excessive wear that led to -- was a direct cause of the

excessive wear and contributed to the Alaska Airlines
 Flight 261 accident."

3 MEMBER GOGLIA: Do we really need anything 4 after detection?

5 MR. CLARK: Well, we usually in the Findings 6 identify those particular findings that go to cause or 7 go to contributing.

8 MEMBER GOGLIA: I'll defer to everybody else9 on that.

ACTING CHAIRMAN CARMODY: Okay. Let me suggest that we -- oh, John has one. Yes. You go ahead and then we'll --

13 MEMBER GOGLIA: I have one at the end and 14 it's Number 44. "At the time of the Flight 261 15 accident, Alaska Airlines Maintenance Program had 16 widespread systemic deficiencies, some of which have 17 apparently not been corrected."

18 I'm not particularly comfortable with some of 19 which have not been corrected in there. Is that --20 ACTING CHAIRMAN CARMODY: Just strike it. 21 MEMBER GOGLIA: Just strike it there. Right 22 after the deficiencies, put a period instead of a 23 comma.

ACTING CHAIRMAN CARMODY: Let me suggest on the Conclusions that we vote on them with the

understanding that 17 and 40, we agreed to in principle 1 and they're being drafted, and we will see the 2 3 language, but -- and with the corrections we have noted 4 as we've gone through today. 5 So, if I could have a motion on the 6 Conclusions? Yes, Member Hammerschmidt? 7 MEMBER HAMMERSCHMIDT: I just wanted to make sure we're clear on Finding 44. 8 9 MEMBER GOGLIA: Period after deficiencies. 10 MEMBER HAMMERSCHMIDT: Okay. 11 MEMBER BLACK: Okay. We'll take care of it 12 in the Recommendations. 13 MEMBER GOGLIA: All right. 41, we were 14 holding 41 until we --15 ACTING CHAIRMAN CARMODY: 41 was redrafted 16 with George's formulation, I thought. 17 MEMBER BLACK: Yes. 18 ACTING CHAIRMAN CARMODY: Yeah. We agreed to 19 that. 20 MEMBER GOGLIA: Okay. That's right. 21 ACTING CHAIRMAN CARMODY: Yeah. Okay? All 22 right. May I have a motion? 23 MEMBER GOGLIA: I make a motion that we 24 accept the Conclusions as modified with the 25 understanding that Number 17 and Number 40 in the draft

1 report are to be rewritten by staff and circulated for 2 members' concurrence.

3 ACTING CHAIRMAN CARMODY: Right. 4 MEMBER GOGLIA: Did I miss anything? 5 ACTING CHAIRMAN CARMODY: No. You said as 6 modified and you mentioned those two. Second? 7 MEMBER HAMMERSCHMIDT: Second. 8 ACTING CHAIRMAN CARMODY: All in favor? 9 (Chorus of ayes) 10 ACTING CHAIRMAN CARMODY: Opposed? 11 (No response) 12 ACTING CHAIRMAN CARMODY: Conclusions are 13 carried. 14 Now for the Recommendations. There are quite 15 a few of these and I want to propose a new one. This 16 is John's. Okay. I'll let John do this one when we 17 get to it. This is yours. Yeah. 18 Okay. I am going to read it. There are 13 19 of these. They are all for the FAA. I will read them 20 and I'm sure my colleagues will stop me as we go 21 through with modifications or corrections. 2.2 Number 1. Issue of Flight Standards 23 Information Bulletin directing air carriers to instruct 24 pilots that in the end of an inoperative or 25 malfunctioning flight control system, if the airplane

is controllable, they should complete only the
 applicable checklist procedures and should not attempt
 any corrective actions beyond those specified.

4 In particular, in the event of an inoperative 5 or malfunctioning horizontal stabilizer trim control 6 system, after final determination has been made in 7 accordance with the applicable checklist that both the 8 primary and alternate trim systems are inoperative, neither the primary nor the alternate trim motors 9 10 should be activated, either by engaging the autopilot 11 or using any other trim control switch or handle. 12 Pilots should further be instructed that if checklist procedures are not effective, they should land at the 13 14 nearest suitable airport.

MEMBER BLACK: I assume we're talking about DC-9 series here?

ACTING CHAIRMAN CARMODY: Well, it's not specific in the recommendation, but I would assume. Do we need to specify?

20 MEMBER BLACK: Maybe we should say that.

21 Shouldn't we, John?

ACTING CHAIRMAN CARMODY: Although -MEMBER BLACK: This is talking about DC-9 MD80 series, is it not?

25 MR. CLARK: Well, I don't see that it is

#### EXECUTIVE COURT REPORTERS, INC. (301) 565-0064

261

1 exclusive of any airplane out there.

2 MEMBER BLACK: Okay. All right. 3 ACTING CHAIRMAN CARMODY: All right. I think 4 it's a generic caveat. 5 MEMBER BLACK: Is that okay, David? Captain 6 Ivey? 7 MR. IVEY: I think that would apply to all 8 aircraft. 9 MEMBER BLACK: Okay. 10 ACTING CHAIRMAN CARMODY: Okay. 2. As part 11 of the response to Safety Recommendation A0141, those 12 were one of the ones we made earlier to the FAA, as 13 part of that recommendation, require operators of 14 Douglas DC-9, McDonnell-Douglas MD-80/90, and Boeing 15 717 series airplanes to remove used grease from the 16 jackscrew assembly acme screw and flush degraded grease 17 and particulates from the acme nut before applying 18 fresh grease. 19 Number 3. 20 MEMBER BLACK: Madam --21 ACTING CHAIRMAN CARMODY: Yes? 2.2 MEMBER BLACK: Madam Chairman? 23 ACTING CHAIRMAN CARMODY: Hm-hmm? 24 MEMBER BLACK: Dr. Kolly, isn't the correct 25 word "worn grease" and not used grease?

1 MR. KOLLY: I believe both of those -- we're 2 talking about grease that needs now renewal. So, 3 however you want to call it, whether you want to call it worn or used, degraded. 4 5 MEMBER BLACK: Degraded might actually be 6 better. Let's use degraded because that's really what It's lost its capabilities and it's 7 it is. contaminated with particles, right? 8 9 MR. KOLLY: That's right. 10 MEMBER BLACK: If you don't mind, let's use 11 degraded. 12 ACTING CHAIRMAN CARMODY: Degraded. Okay. 13 3. As part of the response to Safety 14 Recommendation A0141, require operators of Douglas DC-15 9, McDonnell-Douglas MD-80/90, and Boeing 717 series 16 airplanes in coordination with Boeing to increase the 17 size of the access panels that are used to accomplish 18 the jackscrew assembly lubrication procedure. 19 Number 4. 20 DR. DOWNS: If feasible, I think we should 21 put in there. I mean, this is a monumental task. 22 Doors and access panels on airplanes are not easy. 23 It's not just a simple case of hacking the hole a little larger and putting a bigger piece of aluminum 24 25 over it.

1 MR. GUZZETTI: Actually in this case, you know, and we have some communication with Boeing that 2 3 they're already doing this, that one panel where the banana fairing is, it just has a hinged -- it's a 4 5 fiberglass. It has a hinge on it and they'll just be 6 able to cut out a larger panel and put a hinge on it. So, they telegraphed to us that they're going to be 7 8 doing it anyway.

9 ACTING CHAIRMAN CARMODY: I would think we 10 could go ahead and make the recommendation. If it 11 turns out the FAA finds it obsessive or excessive, they 12 can let us know. Okay.

4. Establish the jackscrew assembly
lubrication procedure as a required inspection item
that must have an inspector sign-off before the task
can be considered complete.

17 Number 5. Review all existing maintenance intervals for tasks that could affect critical aircraft 18 19 components and identify those that have been extended 20 without adequate engineering justification in the form 21 of technical data and analysis demonstrating that the 22 extended interval will not present any increased risk 23 and require modifications of those intervals to ensure 24 that they (1) take into account assumptions made by the 25 original designers, (2) are supported by adequate

1 technical data and analysis, and (3) include an

2 appropriate safety margin that takes into account the 3 possibility of missed or inadequate accomplishment of 4 the maintenance task.

5 In conducting this review, the FAA should 6 also consider original intervals recommended or established for new aircraft models that are 7 8 derivatives of earlier models, and if the aircraft component and the task are substantially the same and 9 10 the recommended interval for the new model is greater 11 than that recommended for the earlier, treat such 12 original intervals for the derivative model as extended 13 intervals.

14 That is a complicated one.

6. Conduct a systematic industry-wide 15 16 evaluation and issue a report on the process by which 17 manufacturers recommend and airlines establish and revise maintenance task intervals and make changes to 18 19 the process to ensure that in the future, intervals for 20 each task (1) take into account assumptions made by the 21 original designers, (2) are supported by adequate 22 technical data and analysis, and (3) include an 23 appropriate safety margin that takes into account the possibility of missed or inadequate accomplishment of 24 25 the maintenance task.

1 7. Require operators to supply the FAA before the implementation of any changes in maintenance 2 3 task intervals that could affect critical aircraft components, technical data and analysis for each task 4 5 demonstrating that none of the proposed changes will 6 present any potential hazards, and obtain written 7 approval of the proposed changes from the principal 8 maintenance inspector and written concurrence from the 9 appropriate FAA aircraft certification office. 10 8. Pending the incorporation of a fail-safe 11 mechanism in the design of the Douglas DC-9, McDonnell-12 Douglas MD-80/90, and the Boeing 717 horizontal

13 stabilizer jackscrew assembly, as recommended in 14 Recommendation 13, (a) establish an end-play check 15 interval that (1) accounts for the possibility of higher-than-expected wear rates and measurement error 16 17 in estimating acme nut thread wear, and (2) provides for at least two opportunities to detect excessive wear 18 19 before a potentially catastrophic wear condition 20 becomes possible, and (b) until such a scientificallybased interval is determined, immediately establish an 21 22 end-play check interval that is appropriately more conservative than the 2,000 flight hours. 23

24 MEMBER GOGLIA: Don't go on.

25 ACTING CHAIRMAN CARMODY: I'm not. I was

1 waiting for your intervention.

2 MEMBER GOGLIA: Yes. Again, I need to digest 3 the changes that were given to us. 4 ACTING CHAIRMAN CARMODY: Yes. Pending the 5 incorporation of a fail-safe -- establish an interval 6 -- I have the change page. MEMBER GOGLIA: Well, I quess I would say 7 here that I disagree with more conservative than 2,000. 8 9 I think 2,000 hours in conjunction with the 650-hour 10 grease cycle and the inspections that go with that 650-11 hour cycle, at least in the interim until we do (a) in 12 this, certainly would provide us with enough safety 13 margin. 14 ACTING CHAIRMAN CARMODY: I'm sorry. We're 15 trying to figure out what page that was. What -- did 16 you make a suggestion, John, that I didn't hear? 17 MEMBER GOGLIA: I just said I don't agree

18 with (b).

ACTING CHAIRMAN CARMODY: And that's (b) being until such time as an interval is determined, immediately establish an end-play check interval appropriately more conservative. Would you suggest what?

24 MEMBER GOGLIA: I think we have to defer to 25 the FAA's folks and what they did with the 650-hour

1 grease job with the inspection, the AD Notice

2 essentially, until they can --

3 ACTING CHAIRMAN CARMODY: Well, are we saying 4 5 MEMBER GOGLIA: -- accomplish a --6 DR. ELLINGSTAD: Excuse me. Again, Member 7 Goglia, this relates to the fact that there is considerable uncertainty about the reliability and 8 validity of the end-play measure. We're awaiting the 9 10 results of validity studies and reliability studies 11 that Boeing has underway. So, again staff feels that 12 this approach to condition this recommendation on the conclusion of that scientific research is a 13 14 conservative and a cautious method to make sure that 15 there is an opportunity to catch excessive wear if it 16 does in fact happen and if there is an inspection that 17 is improperly performed or not performed at all. 18 So, it's conditional on the completion of that work that we know is in progress and we're 19 20 expecting to see some results from. 21 MEMBER GOGLIA: And you started that 22 conversation with the considerable concern or -- I 23 mean, we're basing this, unless I missed something that was said, we're basing this on the wear of one or two 24 25 jackscrews.

#### EXECUTIVE COURT REPORTERS, INC. (301) 565-0064

268

1 DR. ELLINGSTAD: No, sir. We're basing this on the results of all of the data that we have seen 2 3 from repeated end-play measurements that have come in in response to the AD and all of the data that we have 4 5 looked at has produced highly-variable results and a 6 relatively low correlation between successive intervals 7 and also a very low correlation between on-wing and 8 bench end-play measures and no results from any other 9 kind of a direct measure of wear. 10 MEMBER GOGLIA: I still don't -- we're 11 cutting it essentially in half, the time between end-12 play checks. The FAA has done that already and 13 essentially we're saying that's not adequate and I 14 disagree. So -- well, how do you want to handle this? 15 I will make a motion that we strike (b) and now we can have a discussion on the motion and move 16 forward and deal with it. 17 18 ACTING CHAIRMAN CARMODY: Is there a second 19 to the motion? 20 MEMBER BLACK: Second. 21 ACTING CHAIRMAN CARMODY: All in favor? 22 (Chorus of ayes) 23 ACTING CHAIRMAN CARMODY: Okay. All right. 24 The ayes have it. 25 MEMBER GOGLIA: Okay.

ACTING CHAIRMAN CARMODY: Okay. Moving on to Number 9, and I seem to have the latest package you sent, John. I'm reading from it, and the others don't seem to have it. The changes are not large. I'll read what I have.

6 Number 9. Require operators to permanently 7 (1) track end-play measures according to airplane registration number and jackscrew assembly serial 8 number, (2) calculate and record average wear rates for 9 10 each airplane based on end-play measurements and flight 11 times, and (3) develop and implement a program to 12 analyze these data, to identify and determine the cause 13 of excessive or unexpected wear rates, trends or 14 anomalies.

15 The FAA should also require operators to 16 report this information to the FAA for use in 17 determining and evaluating an appropriate end-play 18 check interval.

19 MEMBER GOGLIA: That's fine.

ACTING CHAIRMAN CARMODY: Okay. 10. Require that maintenance facilities that overhaul jackscrew assemblies record and inform customers of an overhaul jackscrew assembly end-play measurement.

24 11. Require operators to measure and record25 the on-wing end-play measurement whenever a jackscrew

1 assembly is replaced.

2 12. Require that maintenance facilities that 3 overhaul jackscrew assemblies obtain specific authorization beyond a Class 1 accessory rating to 4 5 perform such overhauls, predicated on demonstrating 6 that they possess the necessary capability, 7 documentation, and equipment for the task, and that they have procedures in place to (1) perform and 8 9 document the detailed steps that must be followed to 10 properly accomplish the end-play check procedure and 11 lubrication of the jackscrew assembly, including 12 specification of appropriate tools and grease types, 13 (2) perform and document the appropriate steps for 14 verifying that the proper acme screw thread surface 15 finish has been applied, and (3) ensure that 16 appropriate packing procedures are followed for all returned overhauled jackscrew assemblies, regardless of 17 18 whether the assembly has been designated for storage or 19 for shipping. 20 MEMBER BLACK: Ouestion on that one. 21 ACTING CHAIRMAN CARMODY: Yes. 22 MEMBER BLACK: Are we talking about ball jack 23 screws or just acme jackscrews? 24 MR. GUZZETTI: When the Systems Group did 25 their evaluation to come up with this rec, in my mind,

it just addressed acme screws because there, you have 1 an issue involving surface finish and we --2 3 MEMBER BLACK: I think you're right. It just doesn't say that and we found in looking at this 4 5 information that a lot of people use the word jackscrew and ball jackscrew interchangeably. So, it might not -6 - we might ought to say acme jackscrew if that's what 7 we're talking about. 8 MR. GUZZETTI: Or we could just specify the 9 10 airplane model. MEMBER BLACK: Or the DC-9 series. Yeah. 11 12 MR. GUZZETTI: In my mind, we meant it to be for the DC-9, MD-80/90 and 717 series only. 13 14 MR. CLARK: Which is to say, that overhauled 15 DC-9 series or DC-9 type? MEMBER BLACK: Whatever the right terminology 16 17 is. MR. CLARK: DC-9 series and that should 18 19 include the MD-80s, the 717s. 20 ACTING CHAIRMAN CARMODY: Okay. So, what --21 let's -- require -- how does that read now? 22 MR. CLARK: Just in the first line, it says require that maintenance facilities that overhaul DC-9 23 24 series jackscrew assemblies and the implication there, 25 I suppose we could add MD-80 and 717 like we have

1 elsewhere, but --

2 MEMBER BLACK: Aren't they all theoretically 3 DC-9s and MD-80 is a -80? 4 MR. CLARK: I would think so. 5 ACTING CHAIRMAN CARMODY: All right. 6 MEMBER GOGLIA: There's a -50 in there, too. DC-910, 15, 20, 30, 50, 80, 90, and I don't think it 7 8 changed until we went to the 717. MR. CLARK: We can easily add the DC-9, MD-80 9 10 and 717 series and just -- we have other language down 11 below that's quite similar in 13. We'll just carry 12 that. 13 ACTING CHAIRMAN CARMODY: Okay. 14 MR. CLARK: Sure. 15 MEMBER GOGLIA: And before we move on, Mr. 16 Guzzetti, --17 MR. GUZZETTI: Yes, sir? 18 MEMBER GOGLIA: -- Class 1 accessory rating. 19 I'm going by memory here. There is nothing today 20 that's beyond that, is there? 21 MR. GUZZETTI: No, there isn't. You're 2.2 correct. 23 MEMBER GOGLIA: And then, that would require 24 a rule change which, by the time that's done, this 25 fleet type will be beer cans.

MR. GUZZETTI: I would hope that you wouldn't have to do a rule change. Maybe it could simply be -well, if you're going to require maintenance facilities obtain specific authorization, it could be -- I don't know the answer to that, Member Goglia. It could be some sort of inspector's handbook guideline or something.

8 MEMBER GOGLIA: Not binding. We need to look 9 at that.

MR. CLARK: What's -- what we've asked for is to require and we always run into this with FAA that when they see require, that requires an AD and we've repeatedly told them we're using the more generic require and however they can make that happen, we'd be perfectly happy with, and so --

MEMBER GOGLIA: Well, we're saying the stuff in paren, the verbiage in paren is what's going to get us in trouble.

19 ACTING CHAIRMAN CARMODY: Should we strike
20 it? Strike the paren?

21 MEMBER GOGLIA: At least we need to strike 22 the paren.

ACTING CHAIRMAN CARMODY: Strike the paren.
MR. GUZZETTI: Yeah. Striking the parens
would probably be the best bet for that.

ACTING CHAIRMAN CARMODY: Okay. Let's fix
 that one.
 MR. GUZZETTI: Ms. Weinstein suggested that,

4 also.
5 ACTING CHAIRMAN CARMODY: Good. Great minds.

6 Okay.

Conduct a systematic engineering review 7 13. 8 of the Douglas DC-9, McDonnell-Douglas MD-80/90, and 9 Boeing 717 series airplanes to identify means to 10 eliminate the catastrophic effects of total acme nut 11 thread failure in the horizontal stabilizer trim system 12 jackscrew assembly and require that such fail-safe 13 mechanisms be incorporated in the design of all 14 existing and future DC-9, MD-80 and 717 series 15 airplanes and their derivatives.

16 MEMBER GOGLIA: Again, we go back to all the 17 airplanes that have the same acme nut and there are a considerable number. We've excluded those. I think 18 19 that we should not mention the airplane type in this 20 recommendation but mention the jackscrew type since 21 it's to the FAA, we'd like them to look at all of the 22 airplanes that have this system or similar system, and 23 maybe we should talk about the recirculating ball, but 24 at the very least, we need to talk about all the 25 airplanes that have the acme nut installed on the

1 airplane, not single out these group.

ACTING CHAIRMAN CARMODY: I do have a recommendation, a new recommendation that I guess came from Mr. Clark.

5 MR. CLARK: It grew out of Member Black's 6 concern of how we broaden this and part of this for 13 still is -- usually we issue the recommendations for 7 8 the things that we really have a handle on and then 9 issue the more global recommendations to study here. 10 MEMBER GOGLIA: I have so much paper now. 11 ACTING CHAIRMAN CARMODY: I know. This is 12 John's paper. Do we want to talk about this proposal? MEMBER BLACK: We could leave this one and 13 14 then put in the other one.

ACTING CHAIRMAN CARMODY: Well, that was what 16 I thought we were doing.

17 MEMBER HAMMERSCHMIDT: Well, I'm thinking like Member Goglia here. I had looked over Member 18 19 Black's revisions yesterday and he had quite a revision 20 on this one, and then I tweaked it some more from an 21 editorial standpoint and came up with this for another 22 option, and it would read: conduct a systematic 23 engineering review of all transport category airplanes to identify means to reduce the maximum extent possible 24 25 the catastrophic effects of a system or associated

structure failure in the horizontal stabilizer trim 1 2 control system and, if necessary, require that such 3 fail-safe mechanisms be incorporated in the design of all existing and future transport category airplanes. 4 5 MEMBER BLACK: I like it. 6 MEMBER GOGLIA: I like it as well. 7 ACTING CHAIRMAN CARMODY: That's good. MEMBER HAMMERSCHMIDT: Okay. 8 9 ACTING CHAIRMAN CARMODY: Any comments? 10 MEMBER GOGLIA: Second. 11 ACTING CHAIRMAN CARMODY: Are there any comments from staff we should be aware of? This sounds 12 13 good to us. 14 MEMBER HAMMERSCHMIDT: That would be to 15 replace 13. It's a double modification of 13. It's 16 Member Black's substitution and then my editing of his 17 substitution. 18 ACTING CHAIRMAN CARMODY: Hammerschmidt. 19 MEMBER HAMMERSCHMIDT: Amend the amendment. 20 MR. CLARK: I think the -- what it does leave 21 open is that what we want out of 13 -- wanted out of 13 22 is specific efforts in the MD-80 because we have had the failure there, and the one thing I saw in 13 was 23 24 that we had left out -- we say require and for 25 existing, we should have the practicable in there, but

what I see that -- and I'm not sure I heard everything 1 2 in what you read, is that, it leaves it really open for 3 any and all airplanes out there, and I quess our preference was to -- of course, that's certainly, you 4 5 know, the Board's prerogative, but our preference was 6 to directly deal with the MD-80 airplane and then, if those design deficiencies were found on other 7 8 airplanes, to include those. So, and again, I may have 9 misheard or not totally absorbed.

10 MEMBER HAMMERSCHMIDT: Well, I was trying to 11 incorporate all transport category airplanes, which is 12 essentially what Member Black had done, other than the 13 fact that I tweaked his language a bit. Let me read it 14 again just for --

15 MR. CLARK: Okay.

16 MEMBER HAMMERSCHMIDT: -- the sake of repeat 17 here. Conduct a systematic engineering review of all 18 transport category airplanes to identify means to 19 reduce to the maximum extent possible the catastrophic 20 effects of a system or associated structure failure in 21 the horizontal stabilizer trim control system and, if 22 necessary, require that such fail-safe mechanisms be 23 incorporated in the design of all existing and future 24 transport category airplanes.

25 MR. CAMPBELL: If I might try and explain the

difficulty we're having at the table with that 1 formulation? It's the term "if necessary" which we 2 3 think would be appropriate for all category of aircraft, except that which we're looking at here. For 4 5 the group that we've actually identified in this 6 accident, we think that the "if necessary" has already 7 been determined and that we would like to proceed to the fail-safe mechanism, and so by lumping them all 8 9 together, that if necessary seems to put back into play 10 whether or not this particular category of aircraft 11 needs that fail-safe mechanism.

MEMBER HAMMERSCHMIDT: I thought I heard Mr.
Clark just say that he would insert "if practical" at some point in there.

MR. CLARK: Well, that's different than if necessary and again that still directs to DC-9 MD-80 series airplanes.

18 MEMBER HAMMERSCHMIDT: Okay. Well, if 19 practical is all right with me. I was just using the 20 language that Member Black had utilized. So, if 21 practical works.

22 MR. CLARK: Okay. Then the only other issue 23 or the one thing I saw in there is that I still think 24 the language where we had originally had it eliminate 25 the catastrophic effects because in a sense, how do you

reduce to the maximum extent possible a catastrophic? It's kind of either catastrophic or you've eliminated the catastrophic effect. You can't have probably half a catastrophic --

5 MEMBER HAMMERSCHMIDT: I was satisfied with 6 that word "eliminate", but I was talking to someone in 7 the Office of Aviation Safety who said, "Well, how can 8 you actually eliminate something conclusively?" So, I 9 was -- it wasn't the people at this front table, but I 10 was taking a lead on that alternate language from 11 someone from your office.

12 ACTING CHAIRMAN CARMODY: Why don't we return 13 to "eliminate"?

MEMBER HAMMERSCHMIDT: Okay. I know it's a subtle point, I think.

MR. CLARK: No. It's a fair point to say we're never certain in the sense to eliminate that. That's the goal. That's what we strive for, is to eliminate it, get it -- take it off the table, and I think that language is clear.

21 MEMBER HAMMERSCHMIDT: It's certainly more 22 concise.

23 MR. CLARK: I think so, also.

24 MEMBER HAMMERSCHMIDT: That's fine.

25 MR. CLARK: Okay. Let me -- okay. I think

the -- I guess we'd have to just take a quick look.
The -- what I was going -- in the way this is, I think
what you -- you've added other language about
jackscrews and other control structure which I think is
appropriate if we're going to expand it.

6 What I think is that it's -- for existing designs, if practical, and of course, we want it for 7 8 future designs. It's a little hard without seeing it 9 written. You have to really sit down, but -- well, I 10 think the -- okay. It's still easier to us to separate 11 them, but if we're going to combine them, I guess we need to see it written out, but the gist of what we're 12 after seems --13

ACTING CHAIRMAN CARMODY: Let this be one that we kind of agree in principle but you will redraft it and circulate it to us. How does that sound? MR. CLARK: Okay. All right.

ACTING CHAIRMAN CARMODY: And we'll take another look at it because I think there are some subtleties here we might need to consider.

21 MR. CLARK: Okay. On the whole of it, I 22 think it's pretty good. It seems to get to where we 23 want to go, but, you know, I can't -- it's hard to sort 24 out the loopholes in it that we don't intend to be in 25 there.

1 MEMBER BLACK: Well, I was trying to catch 2 some of that business between system and structure, 3 you'll notice, which is --4 MR. CLARK: Yeah. 5 MEMBER BLACK: Just so that we wouldn't have 6 that problem happen again. It is clumsy-sounding. 7 MR. CLARK: Yeah. It's a fair observation. 8 MEMBER GOGLIA: I think the sense of the Board is that we want to combine all the airplanes that 9 10 have this system in it. We want to ask the FAA to take 11 a look at all of them. I don't think it makes sense to 12 ask them to look at them one-by-one-by-one. I think in 13 the broad sense, that they should bring all the parties 14 together and they should look at this issue globally, 15 as you said, and not pick the one fleet type today and 16 defer any work on the rest of it for -- as we often see months or years. I'd like the FAA to sit and address 17 18 this in a timely way, all the airplanes, because I 19 don't want to ever sit here looking at people like this 20 again for another airplane that has a similar design 21 that we didn't get to or they didn't get to yet. 2.2 ACTING CHAIRMAN CARMODY: But, of course, as 23 a practical matter, the FAA's going to have to start 24 with something and they're not going to be able to do

25 them all simultaneously. So, in any event.

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282

1 14. Modify the certification Okay. 2 regulations, policies or procedures to ensure that new 3 horizontal stabilizer trim control system designs are not certified if they have a single-point catastrophic 4 5 failure mode, regardless of whether any element of that 6 system is considered structure rather than system or is otherwise considered exempt from certification 7 8 standards for systems.

9 15. Review and revise aircraft certification 10 regulations and associated guidance applicable to the 11 certification of transport category airplanes to ensure 12 that wear-related failures are fully considered and 13 addressed, so that to the maximum extent possible, they 14 will not be catastrophic.

15 16. Convene a Headquarters-led team to 16 conduct another in-depth on-site follow-up inspection 17 of Alaska Airlines to evaluate whether adequate 18 corrective measures have been fully implemented to 19 address the deficiencies identified in the FAA's April 2000 Special Inspection Report.

21 MEMBER GOGLIA: Madam Chairman, we talked 22 about this at length this morning, and I would like to 23 propose that we just eliminate this recommendation.

ACTING CHAIRMAN CARMODY: Is there a second?
MEMBER HAMMERSCHMIDT: We're talking about --

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283

1 ACTING CHAIRMAN CARMODY: 16, John. Sorry. 2 MEMBER HAMMERSCHMIDT: Second. 3 ACTING CHAIRMAN CARMODY: Okay. All in favor? 4 5 (Chorus of ayes) 6 ACTING CHAIRMAN CARMODY: Opposed? 7 (No response) ACTING CHAIRMAN CARMODY: Okay. All right. 8 9 Now, John, you had one more you wanted to propose and 10 you'll have to work on the language but why don't you do that? 11 12 MEMBER GOGLIA: Right. We earlier talked 13 about the role of dispatch and putting a recommendation 14 in and given all that's going on and the fact that 15 we're coming back with Number 17 and Number 40 as well 16 as --17 ACTING CHAIRMAN CARMODY: 13. MEMBER GOGLIA: -- Number 13 in the 18 19 Recommendations, why don't we add this dispatch 20 recommendation to that list, make it four items that 21 we'll circulate and deal with. Just given all that 22 we've had, it's just too much. 23 ACTING CHAIRMAN CARMODY: Did you read it? 24 MEMBER GOGLIA: No. What we had proposed, 25 it's simple, issue a flight safety information

bulletin. This is to the FAA, asking them to issue a 1 flight safety information bulletin directing air 2 3 carriers to advise dispatch and maintenance control personnel not to place pressure on flight crews to 4 5 continue scheduled flight when they are troubleshooting 6 emergency situations, and I think that we need a little 7 more time to develop the language to fully vet that 8 proposal. 9 MEMBER BLACK: Was this one going to cover 10 giving them adequate assistance, also? 11 MEMBER GOGLIA: Yes, that's what we were 12 struggling with earlier. 13 ACTING CHAIRMAN CARMODY: Okay. So, we need 14 to work on that. 15 MEMBER GOGLIA: So, it needs some work to capture all that this flight crew experienced from 16 17 their support on the other end of the radio. 18 ACTING CHAIRMAN CARMODY: So, that will 19 probably be Recommendation 16 since we struck 16. That 20 will be the new 16. 21 MEMBER GOGLIA: Yes. 2.2 ACTING CHAIRMAN CARMODY: Okay. So, 13 and 23 16 are going to be reworked. 24 MEMBER GOGLIA: And 17 and 40 on the

25 Conclusions.

1 ACTING CHAIRMAN CARMODY: On the Conclusions. 2 Yeah. We've already agreed to that. 3 MEMBER GOGLIA: Hm-hmm. 4 ACTING CHAIRMAN CARMODY: Now we're looking 5 at a motion for the --MR. CLARK: Which recommendation? 6 7 ACTING CHAIRMAN CARMODY: I'm sorry? Yes? 8 MR. CLARK: Which recommendation? ACTING CHAIRMAN CARMODY: Recommendation 13, 9 10 which is being redrafted, and then this new 11 Recommendation 16 from Member Goglia on the dispatch. 12 MEMBER GOGLIA: Okay. I make a motion that 13 we accept the recommendations as modified. 14 MR. CLARK: Okay. And that's the Findings we 15 -- we have 17 --ACTING CHAIRMAN CARMODY: We've already done 16 that, but 17 and 40 were the --17 MR. KOLLY: 17 and 40. 18 19 ACTING CHAIRMAN CARMODY: -- two Findings 20 that needed to be perfected. 21 MR. CLARK: And then a Finding of Dispatch 22 that goes along with the Rec 16. 23 ACTING CHAIRMAN CARMODY: That's a good idea, 24 yes. 25 MR. CLARK: Okay.

1 ACTING CHAIRMAN CARMODY: Okay. Member 2 Goglia's made a motion. Is there a second? 3 MEMBER HAMMERSCHMIDT: Yes, second. ACTING CHAIRMAN CARMODY: All in favor? 4 5 (Chorus of ayes) 6 ACTING CHAIRMAN CARMODY: Opposed? 7 (No response) 8 ACTING CHAIRMAN CARMODY: The Recommendations 9 are adopted. 10 Now, we need to adopt the whole report. 11 MEMBER GOGLIA: I make a motion. ACTING CHAIRMAN CARMODY: Yes. Member 12 Hammerschmidt? 13 14 MEMBER HAMMERSCHMIDT: Well, your motion is 15 to approve? 16 MEMBER GOGLIA: Yes. 17 MEMBER HAMMERSCHMIDT: I would suggest that 18 -- I will second that motion, that we approve it as 19 modified and as modified per the changes that have been 20 made in the Findings, Safety Recommendations 21 essentially, that those changes be taken into 2.2 consideration in the text of the report itself, and so 23 that the report will be modified accordingly, to be consistent with the changes that were made in the 24 Recommendations and Findings. 25

1 MR. CLARK: What we normally do is for the 2 Recs, we back up and have a finding and then 3 appropriate text. For those that are eliminated, those need to be adjusted. For those that are added, we need 4 5 to add text to fit. But other than that, those that 6 aren't touched by that, the report is okay. 7 MEMBER HAMMERSCHMIDT: Right. So, so 8 seconded. 9 ACTING CHAIRMAN CARMODY: Okay. All in 10 favor? 11 (Chorus of ayes) 12 ACTING CHAIRMAN CARMODY: Opposed? 13 (No response) 14 ACTING CHAIRMAN CARMODY: The report is 15 adopted then. 16 Well, this has been a long and, I hope, productive day. I congratulate all the staff for their 17 hard work and their patience. I think you've all done 18 19 an outstanding job, not only today but in the last 20 three years, on this accident, and I'm very grateful to 21 you. 22 MR. CLARK: Madam Chairman, if I may, the --23 I'd like to especially acknowledge people and I probably lost a little bit of a list here, so I'm 24 25 really going to goof it up. But this whole report EXECUTIVE COURT REPORTERS, INC.

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288

1 always comes together with our writers and editors and 2 Karen Bury and Kristen Sears are really the ones that 3 pull it together, make it readable, and I think we've 4 had an opportunity to see a number of people up here 5 that worked actively on it, but basically we ended up 6 with probably at least 25 investigators that each one 7 contributed.

8 I'm not going to go down through their whole name, but there's some other people that -- like Gina 9 10 John and Kevin Renze that worked on the graphics, 11 Carolyn Dargan that set up the room and took care of 12 all of this, and Antoine Downs who certainly helped 13 churn all of that. So, we kind of get our names out 14 here on the factuals and stuff, but Chris Annibale is a student intern working with us, and so he's been 15 running all the graphics, always does. So, we got a 16 17 lot of key players, but out of that, we have about 50 18 investigators at Headquarters and Vern has probably 20 and so out of that 70, at least 25 people were actively 19 20 involved in this investigation.

21 I really want to express my appreciation to 22 each and every one of them.

23 MEMBER BLACK: Madam Chairman?

24 ACTING CHAIRMAN CARMODY: Yes?

25 MEMBER BLACK: As the engineer in the group

here, I feel obligated to say that this is in many 1 respects one of the best reports that I've seen because 2 3 there is really basic science done in several areas. So, we haven't talked much about it, but aircraft 4 5 performance and trying to deal with airplanes that are 6 not exactly like they left the factory and trying to figure out what the loads were and the materials area 7 8 and the grease area and Mr. Guzzetti and we haven't 9 talked about structures, but the documentation of all 10 of the structures that Lorenda did was just first-rate 11 engineering work, and I'd like to thank them for that. 12 ACTING CHAIRMAN CARMODY: Are there comments 13 from any other board members? Member Hammerschmidt? 14 MEMBER HAMMERSCHMIDT: Let me just say very briefly that I thought the staff did an outstanding job 15 16 on this accident investigation and report. I was very 17 close to this investigation being the board member on 18 scene and then having the opportunity to chair the 19 public hearing in this room, and I believe that the way that the staff has operated in a very dedicated 20 21 purposeful way to come up with solutions so that this 22 accident, Alaska Air Flight 261, will not happen again 23 is certainly evident and to be commended, the staff's dedication and purpose. 24

25 George has already mentioned that it's a very

intelligent report and I was commenting to a few people 1 at the front table here, staff table, after the first 2 3 coffee break that I thought that the animation that Mr. 4 Guzzetti showed this morning and narrated was one of 5 the most impressive ones that I've seen since I've been 6 here at the Board and that's pushing guite a few years, 7 and I just want to commend the staff for very hard work, difficult work, and good work, and to the 8 9 families, I certainly want to extend again my deepest 10 sympathy and hopefully that the fruit of all these 11 efforts by these many dedicated investigators will be 12 such that there'll be some good that may come out of 13 such a tragic event.

ACTING CHAIRMAN CARMODY: Member Goglia? MEMBER GOGLIA: I'll say ditto. It was especially in the maintenance issues not exactly easy on staff when we get maintenance issues and you guys did a very good job of investigating those issues, putting them on the table and coming up with good ways to deal with them.

So, even though it pains me to give Jeff Guzzetti any credit, he really deserves a lot of credit along with Frank McGill and, of course, the IIC deserves something. Some credit for it. I can't give you credit, Rod. You've been -- but it was really an

1 excellent, excellent job on this report.

ACTING CHAIRMAN CARMODY: We're going to record that and hold you to it. But thanks to all. It was very good work and thanks to my colleagues for their patience and their cooperation, and we're very glad the families were able to be here and to observe. I hope you've felt that the process was productive. I think we've all -- I believe we've all done something to improve safety today and that's why we all are here. Thank you all. Adjourn the meeting. (Whereupon, at 5:56 p.m., the meeting was adjourned.)