

October 13, 2009

The Honorable William E. Reukauf
Acting Special Counsel
U.S Office of Special Counsel
1730 M Street, NW Suite 218
Washington, DC 20036

Re: OSC File No. DI-08-1733

Dear Mr. Reukauf:

I wish to express my sincere appreciation to everyone in your office who worked diligently throughout the course of this lengthy investigative process. I offer the following comments with regard to the Department Of Transportation Office of Inspector General's investigation and findings.

I'd like to preface my comments by saying I never thought being a "Whistle Blower" (i.e. committingthe Truth) would or should be detrimental to my personal or professional life.

I was wrong.

I have reviewed the report and though it documents the obvious wrongdoing, it has not adequately or accurately detailed several aspects of the case. I submit the following information in an effort to create a more comprehensive and accurate report.

I have worked over 10 years as the UAL-CMO B-777 Partial Program Manager and therefore have extensive knowledge, experience and expertise with regard to the B- 777 maintenance program requirements. I disagree with the OIG's finding "*UAL's battery restoration process was authorized and properly carried out*".

UAL did perform scheduled maintenance tasks for the EPAS battery pack in the shop. However, the issue in this case was UAL had no technical justification or FAA approved data to change the manufacturer's specifications for service life of the ni-cad battery inside the EPAS unit. Further exacerbating the problem was UAL did not track the "on " and "off" time (i.e. installation and removal from aircraft) of the batteries to know when the total 3 year service life was reached. The manufacturer's specification states 3 years service life after 10 years shelf life. This specification constitutes part of the type design for the appliance. To make any changes to the specification requires FAA approved data or manufacturer approval. UAL had neither of those approvals. In fact on March 15, 2007 the UAL engineer responsible for the EPAS component left me a voice message stating he didn't have any technical justification other than having interpreted the component maintenance manual as allowing for 10 years of serviceable life. During the investigation I visited the shop where the packs were maintained and discovered batteries that were just removed from an aircraft and were over 10 years old. The evidence indicated there was no positive documented control over the EPAS battery. This posed a very serious safety concern because of the critical safety function the EPAS serves on the B-777 aircraft.

Another aspect the OIG didn't report was the Suspected Unapproved Part (SUP) investigation that coincided with the Enforcement Investigative Report (EIR). By virtue of UAL improperly restoring the EPAS beyond the 3 year service life, this made the part unapproved for installation on the aircraft. The SUP investigation confirmed the parts were unapproved. That meant all UAL's 52 B-777 potentially would be grounded until the parts were replaced. This implication was immediately obvious to both FAA and UAL. To address the immediate safety concern the FAA met with UAL personnel to discuss appropriate resolution for managing and mitigating the safety risk. I attended the meeting along with my immediate supervisor Mr. Krum. I suggested UAL should perform a simple push button test before each flight to ensure the EPAS pack had sufficient charge should it be needed in case of an emergency evacuation. UAL stated they would take the discussion under advisement and respond in writing to the FAA. UAL responded and declined to perform the test even though it was in the interest of safety. I was astounded and disturbed by UAL's response. I discussed the matter with my supervisor. I urged Mr. Krum to use appropriate authority to require UAL to perform the test. I explained there was no "down side" to doing the test before each flight. If you push the test button and the EPAS is good, the risk is mitigated because there is evidence the EPAS will work if needed. If you push the button and the EPAS fails, the risk has been identified and must be corrected before placing an aircraft in revenue service. The result of the discussion was Mr. Krum stated he was "okay" with UAL's response, thereby allowing the air carrier to operate with a known unsafe condition. His decision seems to defy common sense and more importantly, is contrary to the FAA mandate to ensure safety for the flying public.

The OIG report states CMO personnel involved in reviewing my EIR found my original draft was not "focused, hard to follow, and did not contain sufficient items of proof to substantiate the allegations." Also, it says Mr. Krum tasked me to rewrite the draft EIR, but according to him, her attempts still did not result in a quality EIR. Therefore he asked another ASI, Dennis Thorpe to assist me in re-drafting the EIR.

My comment on the excerpt above:

I categorically reject the veracity of their responses. The case was complex and required extensive time for gathering and compiling the evidence. I worked diligently to complete the EIR. The reason ASI Thorpe became involved at all was due to my time out of office to attend formal training, not because the EIR was unfocused and hard to follow. As far as sufficient items of proof, I made every reasonable effort to gather the records necessary, but encountered both internal and external interference for that endeavor. The political sensitivity of the case became an overriding factor. Then coincidentally, Mr. Krum came to me in August 2007 and informed me UAL had filed a complaint against me. I have provided the two grievance documents, UAL "complaint letter" and FAA Letter of Admonishment as evidence of the method used to take care of the "problem" FAA Inspector.

The OIG report states Mr. Thorpe then re-drafted the EIR, dated June 14, 2007, concluding that UAL violated the FAR by using an unapproved process to restore the EPAS batteries. CMO management transmitted the EIR to FAA's Western Pacific Region Counsel's office for review, concurrence and processing. During this time, Ms. Henderson complained to Naomi Tsuda, Western Pacific Regional Counsel, that the EIR, as forwarded by the CMO, did not accurately address the safety violations. Ms. Tsuda told us that the EIR was forwarded to FAA's Northwest Mountain Region for review in order to obtain a more independent viewpoint of it. Further, Ms. Tsuda informed us that she considered the findings in this EIR to constitute an administrative violation, i.e., an unapproved process, and not a safety violation. Accordingly, she did not process the EIR expeditiously.

My comment on the excerpt above:

June 14, 2007 is the date the EIR was sent from the CMO to the Western Pacific Regional Office for final disposition by FAA legal department. I had no communication with Naomi Tsuda until **March 2008**, when the Congressional Hearings about the FAA were imminent. I got an email from AWP legal Regional Counsel, Naomi Tsuda inquiring about the EPAS EIR case. She stated she was working it. Naomi had several questions about the case. I responded and eventually, on March 11, 2008 we spoke on the phone.

I indicated to Naomi the EPAS case was "**just like the Southwest Airlines case**" that it had gotten "**very political and I became the problem**". The next day, March 12, 2008 I sent Naomi an email requesting she send my supervisor, Kavin Krum an email requesting my assistance in gathering more records to support the EIR. She didn't send an email, however about 20 minutes later Assistant Office Manager, Brad Lewis appeared at my cubicle and requested to speak with me about the EIR. I spent from approximately, 1330 until 1600 talking with Mr. Lewis and Mr. Holt about the prospect of gathering more records.

Normally, I would have no problem going to United and gathering records, but the "complaint letter" and Letter of Admonishment served to remind me I was at risk for doing my duties properly.

Ms. Tsuda informed me by email on May 7, 2008 the reason for sending the case to Northwest Mountain region was due to **staffing issues**, not to obtain a more independent view.

I fail to comprehend how Ms. Tsuda considered the case to be an administrative violation and not a safety violation. How can performing an "unapproved process" on an emergency device not constitute a safety violation when the sole purpose of the device is safety.

The OIG report states Greg Young, ASI-Airworthiness Specialist, Northwest Mountain Region, was assigned to review and evaluate the EIR. After his review, Mr. Young reported that under the provisions of 14 CFR Part 43.13 (c), UAL was authorized to develop and utilize its EPAS battery restoration process, thus no enforcement action was warranted.

My comment on the excerpt above:

I disagree with Mr. Young's opinion. It is true, every air carrier has authorization under it's Continuous Aircraft Maintenance Program to develop their maintenance program requirements. However, it must be based on valid technical data (such as published manufacturer's manuals, service bulletins, service letters, air carrier reliability program data etc.) or approved data. As was shown, UAL had no technical or approved data to extend the service life of the nicad batteries contained inside the EPAS assembly. Therefore, enforcement action was appropriate.

In conclusion, all of my comments can be verified through documented evidence.

The comments I've made don't begin to expose the scope of what happened over the course of the EPAS battery case. In my 14+ years as an FAA Inspector I've never seen an Enforcement Investigative Report handled with such a "choreographed intent" to dismantle the case. In the end the EIR was returned from the Northwest Mountain Region to the Western Pacific Region for handling. The EIR was then returned to the UAL-CMO for Administrative Action.

According to FAA Order 2159.3B, Administrative Action is NOT the same as No Action. Administrative Action includes Legal Action. On July 9, 2008 I was directed by Mr. Krum to close the EIR out "No Action" by close of business July 10, 2008. I responded by sending an email declining to go against FAA Order 2150.3B and to have my name removed as the Inspector of record. My email included the CMO Assistant Office Manager, Brad Lewis and Office Manager Jack Grossman.

The OIG report stated. Our investigation did not find evidence of impropriety on the part of either the CMO Manager or Assistant Manager.

The OIG investigation didn't report FAA Order 2150 3B wasn't followed for final disposition of the EIR even though it was reported to the OIG. This would constitute impropriety.

The EIR was closed out "No Action". That's the equivalent of "it never happened".

A positive result of the EPAS investigation was UAL agreed to expedite replacement of the old style EPAS unit (which contains a nicad battery) with the new style (no nicad battery) according to the requirements of Airworthiness Directive (AD) 2006-11-13 before the final replacement date of June 30, 2008.

Final thought: My saying is "It's not a problem, until it's a problem". In November 2007 UAL had a B-777 inbound from Shanghai that declared an emergency on approach to landing at Chicago O'Hare Airport. The emergency evacuation utilized the EPAS system and functioned without incident. The old style EPAS had been changed on that aircraft just 2 months earlier.

Respectfully Submitted,



Cheryl L. Henderson

Attachments: 4

Grievance Documents (2)

UAL complaint letter

Letter of Admonishment



U.S. OFFICE OF SPECIAL COUNSEL
1730 M Street, N.W., Suite 218
Washington, D.C. 20036-4505
202 254-3600

CONSENT TO PUBLIC RELEASE
OF WRITTEN COMMENTS ON AGENCY REPORT

(OSC File No. DI-08-1733)

I consent to the public release by the U.S. Office of Special Counsel (OSC) of my written comments on the agency report produced in response to OSC's referral of my disclosure in the above-cited case. My consent includes placement of my written comments in the public file maintained by OSC pursuant to 5 U.S.C. § 1219(a)(1).*

The documents contained in OSC's public file will be placed online at www.osc.gov. I understand that my consent means that my written comments will be included in OSC's public file. I also understand that my consent means that my comments may be included in an OSC press release, or other media-related document, posted from time to time on OSC's website (www.osc.gov). Finally, I understand that my consent means that OSC may release my written comments in response to an outside party's request for access to the public file or in other circumstances deemed appropriate by OSC.

Cheryl L. Henderson
Name (signature)

CHERYL L. HENDERSON
Name (printed)

October 16, 2009
Date

* 5 U.S.C. § 1219 ("Public information") reads, in relevant part: "The Special Counsel shall maintain and make available to the public ... a list of ... matters referred to heads of agencies under [5 U.S.C. § 1213(e)], together with reports from heads of agencies under [§ 1213(e)(1)(B) about] such matters."

FAA Engagement with Maintenance Records Staff

FAA Inspector Cheryl Henderson visited MR Records on Wednesday June 13, at 1:15 PM. She was escorted by one of the avionics shop foreman. She wanted to review SFAR 36 Major Repair records; MR personnel provided her the requested records. The next day a discussion with MR staff it was revealed Ms. Henderson had stayed until 3 PM, at which time the records vault closes. Further discussion revealed, after completing the SFAR 36 review, Ms. Henderson walked around the office and reviewed various workstations. In addition, she approached MR personnel and asked questions about Aircraft Records functions. She was particularly interested in the document scanning process currently tested by Aircraft Records, and she wanted to know about the MR budget. After the discussion, MR staff was informed to provide FAA Inspectors with any request for documents. However, information regarding records retention procedures should come from the supervisor or myself. The FAA visits and subsequent discussion were reported to the MR supervisor by MR personnel.

The next event occurred Wednesday July 11, 2007. Sheryl Henderson FAA Avionics Inspector arrived in maintenance records, at 8:30 AM. She wanted access to 777 maintenance records supporting her concerns regarding improper maintenance on EPAS batteries.

Her efforts tied up maintenance records staff for several hours, approximately 2.5 hours during a busy workday. She made copies of the records and left the area when she was satisfied.

When I learned of this event from others on Monday afternoon July 16, I confirmed the occurrence with the records employee involved on Tuesday when he returned to work. During the discussion I learned from our employee that Sheryl made several negative statements about United's maintenance program claiming the program was not in compliance to the requirements. Sheryl also made several negative comments in his opinion regarding Inspection and Quality Assurance implying that these groups did not know or understand the regulations.

On Friday July 13, 2007, a QA representative visited Aircraft Records and informed them to notify their office anytime Ms. Henderson appeared in the Records office. That she was supposed to be escorted, and any documents she needed should be copied with a second copy to QA.

Records personnel contacted QA on Monday morning July 16, 2007, and asked for clarification as to the reason for this added control, with the emphasis on Ms. Henderson. QA informed MR that Ms. Henderson's was investigating a perceived problem with the EPAS batteries.

My actions to date has been to inform QA of this event and to inform our MR staff to work constructively with the FAA since they have official authority to gain access to our records of maintenance but to notify Quality Assurance who will immediately provide a representative to support the FAA Inspector. Also that the FAA inspector is not to leave

with any original records and that any records they want are to be copied by UAL and given to Quality Assurance before the FAA inspector leaves.

In my discussions with the records employee he was concerned about the approach and questioning from the FAA inspector. He works frequently with other FAA inspectors conducting investigations or reviews and those events are not issues.

Bob Scoble
7/19/2007

to Cheryl Henderson
displant Official UPL
Daly (2) 2001 Jun pos Sierra Blvd
5/12/07

2001 Jun pos Sierra Blvd

Note: Kawa refused/declined to sign as to requested.

GRIEVANCE RECORD	<i>FOR FAA USE ONLY</i>
	NO

AGGRIEVED

1A. EMPLOYEE'S NAME ASI CHERYL HENDERSON	1B. FACILITY DOTEFAA AWP/CMO-29, UALA SPO CMO	1C. LOCATION DALY CITY, CA
2. ARTICLE/SECTION VIOLATED ARTICLE 18 Section 1 & 2 ARTICLE 6 Section 1a(1)	3. INCIDENT DATE AUGUST 14, 2007	4. NAME OF UNION REPRESENTATIVE RICHARD NORAT
5. INFORMAL GRIEVANCE OFFICIAL NONE	6. INFORMAL DECISION DATE N/A	7. ORAL PRESENTATION REQUESTED <input type="checkbox"/> YES <input type="checkbox"/> NO

GRIEVANCE

8. DESCRIPTION

On August 2, 2007 at 1400 hrs. my supervisor Kevin Krum came to my work station and requested to speak with me in his office. I acknowledged his request and followed him into his office. The meeting commenced by Kevin informing me he had received a formal complaint from United Airlines regarding my conduct in the performance of my assigned / official duties. I asked if the complaint was in writing. Kevin confirmed it was a written complaint. The written complaint was not shown to me during that initial meeting. I asked Kevin who specifically had lodged the complaint and what the allegations entailed. Kevin responded by saying he wasn't prepared to discuss the issue right then, but informed me he would do so in a meeting to be held on August 14th.

By email later that day, I contacted my office PASS Representative, Richard Norat and informed him of the situation. Mr. Norat notified management by email dated Aug. 8, 2007 outlining the options for having the investigatory meeting in light of everyone's schedule. Management never responded to his email that day or subsequently. (**Attachment 1**)

On Aug 14th at 1310 hrs. Kevin came to my workstation and informed me he wanted to have the Weingarten meeting in his office at 1330 hrs. I asked Kevin if he had seen Mr. Norat's email from Aug. 8 and Kevin acknowledged he had. I respectfully informed Kevin I did not want to participate in a meeting without PASS Representation. Kevin insisted on having the meeting and he stated I had had adequate time to schedule a PASS Representative for the meeting. I don't know how it would have been possible for me to have scheduled a PASS Rep since the time of the meeting had never been disclosed.

To comply with my supervisor's directive, I hurriedly began trying to locate a PASS Rep by phone. I was unsuccessful. In order to have someone present on my behalf, I requested former office PASS Rep, ASI Sharon Gallagher to attend. Fortunately, while in Ms. Gallagher's workstation I received a call from Deputy RBA Michael Delaunay. RBA Joly had gotten my phone message and requested Deputy RBA, Delaunay attend telephonically. Both Sharon and Michael were in attendance at this investigatory meeting.

On August 14, 2007 at 1330 hrs. the investigatory meeting was held at the UAL-CMO by supervisor Kevin Krum and Steven L. Crutcher (acting). Management directed this meeting be held with only 20 minutes notice to me. The subject of the meeting was a written complaint, herewith attached (**Attachment 2**), alleging certain unprofessional and improper conduct by me during the course of two visits to the United Airlines Maintenance Facility in San Francisco, CA. Before that meeting, I had never seen the written complaint against me even though management was notified and requested to provide me with a copy before such meeting in Rep. Norat's email on August 8, 2007. (**Attachment 1**)

Kevin proceeded to open the middle drawer of his desk and produce a U.S Government envelope that was taped closed. Kevin opened the envelope, removed the written complaint and handed it to me. The complaint had neither United Airline's Company letterhead nor any signature indicating who created the document and its' authenticity. The printed name at the end of the complaint is Bob Scoble. Presumably, this is United Airline's Chief Inspector. However, the document lacks proper identification of the individual's job title, which is suspect since Mr. Scoble acted on behalf of United Airlines when he submitted the complaint.

On August 15, 2007 I went to Kevin's office and requested to make a copy of the complaint (**Attachment 2**). Kevin removed the document from the U.S. Government envelope. I inquired if the complaint had come to him in that envelope. He said "yes". I asked if he had placed the complaint in that envelope. Kevin said "no". I asked who had. Kevin said he didn't know and he wasn't going to "play that game". I requested to make a copy of both the complaint and the envelope. Kevin emphatically stated I could not make a copy of the envelope. I went to the copy room and made one copy of the complaint. In order to verify the copy was genuine, I used a stamp to state this. I returned to Kevin's office and returned the original. I requested Kevin to sign the stamped section acknowledging he had verified the copy I made was complete. Kevin refused to sign and I made an annotation to that effect.

I have reviewed the allegations, and I find them totally false and not representative of my conduct or demeanor during those or any other visits to the United Airlines facility in my capacity as the Avionics Program Manager for the B-777 fleet.

This grievance is submitted to inform FAA management officials that while performing my duties as an FAA Aviation Safety Inspector my conduct with United Airlines employees was at all times professional and proper.

Also, this serves to remind FAA management officials under the PASS/Flight Standards Collective Bargaining Agreement (CBA) Article 18, when there are professional differences of opinion in matters of determination of fact, the employee in the best position to observe the event shall be the most reliable determiner of fact.

Therefore, in the spirit and letter of the CBA FAA Management officials must place the statement of the Inspector first and foremost as the best determiner of evidence and actual events as they occurred.

9 CORRECTIVE ACTION DESIRED

1. I request a letter of apology from supervisor Krum stating the evidence in this case supported my actions while performing official duties at United Airline's and I demonstrated proper and professional conduct required of FAA Aviation Safety Inspectors.
2. I request a letter confirming the meeting and all issues discussed on August 14, 2007 did not constitute any form of disciplinary action as defined in the CBA Article 6 Section 1a.
3. To authenticate the written complaint, which was the basis for the investigatory meeting, I request a letter detailing how the complaint was officially processed into this office and came into supervisor Krum's possession.

SUBMISSION

RECEIPT ACKNOWLEDGED

10 EMPLOYEE'S SIGNATURE <i>Charles A. Anderson</i>	11 DATE 8/28/07	12 MANAGEMENT OFFICIAL'S SIGNATURE <i>[Signature]</i>	13 DATE 8/28/07
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DISPOSITION

14 DESCRIPTION



Federal Aviation
Administration

Memorandum

Date: October 1, 2007

From: Frontline Manager, PAI

To: Cheryl Henderson, Aviation Safety Inspector,

Subject: Admonishment

This is notice that you are officially admonished for:

- Your failure to exercise courtesy and tact in dealing with fellow workers, supervisors and the public.

It has been brought to my attention that during work assignments that were conducted at United Airlines between June 13, and July 16, 2007, you:

- Made several negative statements about United Airlines' maintenance program and
- Made several negative comments regarding United Airlines' Inspection and Quality Assurance implying that these groups did not know or understand the regulations

Statements such as these do not demonstrate that you exercised courtesy and tact when dealing with the public

Additionally, in the work place, I have observed and it has been reported to me that you often display a condescending attitude toward your fellow workers. This behavior does not exhibit tact and courtesy in dealing with your fellow workers and disrupts the orderly conduct of business.

Order 3750.4A, outlines expected employee conduct. In Chapter 2, Paragraph 201, Employee Responsibilities, says "Employees are responsible for conducting themselves in a manner which will assure that their activities do not reflect discredit on the Federal Aviation Administration" and specifically Item d, specifically states that employees must "Exercise courtesy and tact in dealing with fellow workers, supervisors, and the public" as a basic on-the-job rule.

Your direct contact with the public plays a significant role in determining the public's attitude toward the FAA. Therefore my expectation is for you to approach your duties in a businesslike manner and maintain such an attitude throughout the workday. Additionally, I expect that you will not make irresponsible, false, or defamatory statements, which attack without foundation the integrity of other individuals or organizations or disrupt the orderly conduct of official business.

It is unfortunate but necessary to bring these concerns to your attention. I expect you to be professional, tactful, and courteous to your customers, co-workers and managers at all times. Please understand that this memorandum is meant to advise you of my expectations and to correct your behavior.

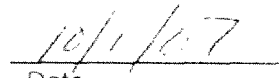
This written admonishment is considered an informal disciplinary action and will be placed on record in this facility. However, it does not become a part of your Official Personnel Folder (OPF). It is hoped that by bringing these concerns to your attention you will correct your behavior. However, if there is a recurrence of this or other inappropriate behavior you may be subject to formal disciplinary measures.


The EAP has a variety of resources available to assist employees who may be experiencing personal and work-related difficulties. You can contact the Employee Assistance Program at 1-800-234-1EAP. They offer confidential consultation services to help address difficult situations that may be affecting work, personal or family interactions. If you have not been in contact with a consultant from this resource, you are encouraged to do so.

As always, I am available to discuss this or other matters with you to help ensure a good working environment.


Kevin Krum


Acknowledgement


Date

Rec'd
Oct 1, 2007


GRIEVANCE RECORD

10/22/07

AGGRIEVED

1. NAME OF AGGRIEVED: ASI Cheryl Henderson
 2. TITLE: Avionics Fleet Program Manager
 3. ADDRESS: [Redacted]
 4. CITY: [Redacted]
 5. STATE: [Redacted]
 6. ZIP: [Redacted]

GRIEVANCE

8. DESCRIPTION

On October 1, 2007, ASI Cheryl Henderson was presented the attached Memorandum ADMONISHMENT (aka "Memo") from Supervisor FLM Kevin Krum. The document does not fairly and accurately reflect work events and functions that actually occurred in the performance of my duties as the Avionics Fleet Program Manager for the United Airlines B-777 fleet.

In this "memo", Supervisor Krum states, in part, "...Your failure to exercise courtesy and tact in dealing with fellow workers, supervisors and the public..." was the basis of the Memo along with "...several negative statements about United Airlines' maintenance, quality assurance and inspection programs..." Nowhere does Supervisor Krum state the date, time, location or person[s] making these unfounded allegations. Indeed, in this nation, one of the inherent rights of an accused wrongdoer is to directly face the individual making that accusation. Yet in the instant case, no substantiated facts are presented by this Supervisor. Rather, he only presents HEARSAY and INNUENDO.

In accordance with the Collective Bargaining Agreement as well as FAA Orders, disciplinary and/or adverse action[s] for JUST CAUSE and must be FAIR AND EQUITABLE based on the evidence presented. In the instant case, an Inspector with no prior incident of inappropriate or unprofessional conduct is presented a Memo of ADMONISHMENT with no substantiation. Further, Article 18 requires the employee to be in the best position to determine the facts of a given event. Here, Supervisor Krum has failed to observe that Rule of Law

OFFICE LEGAL COUNSELMAN FAILED TO SIGN ACKNOWLEDGEMENT ON 12 OCT 07. FAX'D TO CHFO DENVER 10/21/07. SUBMITTED DIRECTLY TO OFFICE MANAGER IAW ART 5, SEC 7 A. PARAGRAPH #2 OF CBA ACCT

THE PROFESSIONAL AIRWAYS SYSTEMS SPECIALIST UNION (PASS) IS THE EXCLUSIVE REPRESENTATIVE OF THE FEDERAL AVIATION ADMINISTRATION FLIGHT STANDARDS DIVISION. PASS IS AFFILIATED WITH THE AFL-CIO THROUGH THE MARINE ENVIRONMENTAL BENEFICIAL ASSOCIATION (MEBA)

9. CORRECTIVE ACTION DESIRED

- (A) WITHDRAW THE MEMO OF ADMONISHMENT IN WRITING, STATING IN PART THAT IT WAS ISSUED IN ERROR
- (B) COUNSEL MANAGERS AND SUPERVISORS TO HONOR THE CONTRACT BY RELYING ON THE EMPLOYEE (ASH) AS THE BEST OF TERMINAL REFACTORY FOR EVENTS THAT OCCUR IN THE FIELD
- (C) DISCIPLINE PERSONNEL FAIRLY AND EQUITABLY IN ACCORDANCE WITH FAA ORDERS AND POLICIES

SUBMISSION

RECEIPT ACKNOWLEDGED

10. EMPLOYEE'S SIGNATURE

11. DATE

12. MANAGEMENT REPRESENTATIVE'S SIGNATURE

13. DATE

[Handwritten Signature]

10/22/07

[Handwritten Signature]

DISPOSITION

14. DESCRIPTION