



---

## Memorandum

Date: May 9, 2018

Subject: INFORMATION: Revised Notification | Review of FAA Oversight of Air Carrier Maintenance Programs | Project No. 17A3003A000  
Federal Aviation Administration

From: Matthew E. Hampton   
Assistant Inspector General for Aviation Audits

To: Director, Audit and Evaluation

---

In June 2017, the Office of Inspector General announced a review of the Federal Aviation Administration's (FAA) oversight of air carrier maintenance, which had been requested by the Ranking Members of the House Transportation and Infrastructure Committee and its Subcommittee on Aviation in light of safety events and disclosures regarding airlines' maintenance practices. At that time, our audit objectives were to assess FAA's oversight of air carrier maintenance programs and whether FAA considers factors such as mergers, rapid expansion, or cost-cutting initiatives when it adjusts its oversight of air carrier maintenance programs. Consequently, we initially planned to assess air carrier maintenance across the industry. For the reasons outlined below, we are now adjusting the scope of our review.

During our initial audit work, we visited two air carriers and found that FAA had moved its oversight strategy from emphasizing enforcement actions to working with carriers to address the root causes for noncompliance of safety regulations. We also found that the relationships and information-sharing practices between air carriers and their FAA oversight offices vary significantly. In addition, maintenance programs at air carriers are affected by differences in fleet mix and other operational considerations. Given these factors—as well as our analysis of complaints to the FAA hotline about the maintenance programs at two air carriers—we decided to refocus the next phase of the audit. In February, we informed congressional staff that we were adjusting our approach and focusing on two carriers, Allegiant and American Airlines.

Furthermore, in April, we received four more request letters from various congressional committees and Members asking us to examine a range of issues

associated with FAA's oversight of Allegiant that had been highlighted in recent media reports. These requestors include the Ranking Member of the Senate Committee on Commerce, Science and Transportation; the Ranking Member of the House Appropriations Committee and the Ranking Member and Minority Members of the House Appropriations Subcommittee on Transportation, Housing and Urban Development, and Related Agencies; Congresswoman Jacky Rosen; and Congresswoman Cheri Bustos. A key issue raised by a number of requestors is how FAA implements its compliance philosophy, which focuses on working with air carriers to address the root causes of noncompliances of safety regulations rather than emphasizing enforcement actions.

Therefore, based on our initial audit work and the additional congressional requests, we are adjusting the scope of this audit. Our objectives now are to assess FAA's processes for investigating allegations of improper maintenance practices at two carriers, Allegiant Airlines and American Airlines. Specifically, we will (1) examine FAA's independent reviews, complaints to the FAA hotline, and other sources to see whether inspectors conducting routine surveillance of Allegiant and American Airlines found similar discrepancies and (2) determine whether FAA ensures that Allegiant and American Airlines implement effective corrective actions to address the root causes of maintenance problems.

We will continue our audit work at FAA's Certificate Management Offices and at the air carriers. If you have any questions, please contact me at (202) 366-0500 or Tina B. Nysted, Program Director, at (404) 562-3770.

cc: DOT Audit Liaison, M-1  
FAA Audit Liaison, AAE-100