
VOLUME 6. SURVEILLANCE

CHAPTER 2. SPECIFIC TYPES OF INSPECTIONS

SECTION 13. INSPECTION PROCEDURES DURING AIRLINE STRIKES, LABOR UNREST, FINANCIAL STRESS (PTRS CODE 1629)

361. GENERAL. This section contains information and guidance to be used by Flight Standards managers and inspectors when conducting surveillance of operators during periods of strike, labor unrest, and financial stress. During these periods, Flight Standards Service (AFS) may decide that the public interest requires an increased level of surveillance of specific operators.

A. Reporting Safety Concerns. The Flight Standards Safety Analysis Information Center (FSAIC) maintains a system to analyze financial data reported to the Department of Transportation by 14 CFR part 121 operators. Regional Flight Standards Division (RFSD) managers, Certificate Holding District Office (CHDO) managers, and principal operations inspectors (POI's) must also be alert to events which raise questions about an operator's ability to safely conduct operations. Information may appear in normal surveillance reports, reports from the public, or reports from responsible sources. When managers or POI's become concerned about an operator's ability to safely conduct operations, they shall notify the RFSD manager. When a part 121 operator is involved, the RFSD manager or their designated representative shall notify the FSAIC.

B. Initiation of Increased Surveillance. The POI's, the CHDO managers, and the RFSD managers, in conjunction and concurrence with FSAIC, are responsible for initiating increased levels of surveillance of part 121 operators. RFSD managers are responsible for increasing the level of surveillance of part 135 operators. Principal inspectors should notify the FSAIC through the regional office when additional surveillance or targeted inspections are deemed necessary for a particular part 121 air carrier. When an RFSD manager initiates increased surveillance of a part 135 operator, the RFSD manager shall notify the FSAIC.

C. Surveillance Plan. When the FSAIC or the RFSD manager decides to initiate a program of increased surveillance, the RFSD and the CHDO must then develop the surveillance program in conjunction with the FSAIC prior to the implementation of the plan. The details of the surveillance plan should include advanced statistical analysis provided by the FSAIC, specified work activities to be accomplished within the geographic environment, guidance

for accomplishing the surveillance program, and a time-frame for completing and tracking the surveillance program.

363. RESOURCE MANAGEMENT. FAA resources are often strained to meet the increased level of surveillance required during these periods of operating stress. RFSD's and FSDO's having geographic responsibility for the operator must, therefore, develop a plan for accomplishing the necessary work. FSDO managers may be required to defer normal surveillance activity to accomplish the special requirements. This situation may exist for an extended period of time; therefore, FSDO managers should coordinate priorities with their RFSD manager.

365. RELEASE OF INFORMATION. In the course of conducting special surveillance, an inspector inevitably acquires special knowledge about the operator and forms private opinions. Inspectors and managers should not, however, express their personal opinions or discuss any findings with the press or any members of the public. Inspectors should refer all public inquiries regarding the status of FAA activities to the appropriate regional public affairs office.

367. REPORT AND ANALYSIS FUNCTION. The two types of reporting mechanisms that are required to be used as a result of an increased surveillance are: a) daily data entry into the Program Tracking and Reporting Subsystem (PTRS) to record the inspection activity and the results of the inspection activity; b) a weekly status report to the FSAIC from each affected region that describes the types and numbers of inspection activity and any significant findings.

A. PTRS Activity Reporting. During a period of increased surveillance, inspectors should record in the PTRS system any surveillance activity that is conducted on the affected operator. The inspector should enter activity code 1629 in the tracking field, which distinguishes the activity as being part of a group of increased surveillance. The inspectors should pay close attention to the guidance distributed with the increased surveillance program for any special tracking that is identified for use in creating the PTRS trans-

mittals. All PTRS activities must be entered on a daily basis.

(1) *Specific Inspection Activities.* Inspectors must record each specific surveillance activity, such as a ramp inspection (code 1622) or an en route inspection (code 1624), by using the appropriate PTRS activity code in the activity field and code 1629 in the tracking field.

(2) *Non-Specific Surveillance.* General surveillance activities not otherwise identified with a specific activity code will be recorded by the inspectors by entering activity code 1629 in the activity field and in the tracking field.

(3) *Immediate Notification.* Inspectors must notify the POI directly by telephone when surveillance reveals the existence of discrepancies that directly affect safety.

B. Weekly Status Report. The weekly status report is a summary of surveillance activity that is provided to the FSAIC by the RFSD and CHDO. The weekly status report should be sent by electronic mail to the FSAIC at 9-AWA-FSAIC for distribution to the other FAA Headquarters' divisions. The guidance provided for reporting the results of the increased surveillance program should include specific details and deadlines for the reporting of the PTRS transmittals and the weekly status reports.

(1) *Format.* Operations, airworthiness, and avionics surveillance activities should be reported by using a table format listing the PTRS activity numbers, description of the activity number, and statistical summary. Please see the example below.

PTRS	DESCRIPTION	CHDO	OTHERS	TOTAL
1622	Ramp	3	0	3
1624	Cockpit-En Route	8	4	12
1635	Facility	1	6	7
TOTAL		12	10	22

COMMENTS:

(2) *Comments.* In addition to the numerical data, the weekly status report should include significant comments pertaining to any area of concern that the originator feels appropriate. Significant comments may include the following:

- Aircraft/route acquisitions
- Status of reorganizations/mergers/buy-outs
- Changes in management personnel, equipment
- Changes in financial condition
- Current compliance status
- Any pending enforcement cases
- Other areas reflecting a change in the carrier status

- Newsworthy items

C. Resumption of Normal Operations. After the strike, labor unrest, or financial distress has been resolved, normal operations may not be resumed for several weeks. During the transition to normal operations, however, it may be desirable for the FAA to revise the level of surveillance of the operator. It is important that the internal FAA coordination be maintained to ensure implementation of the appropriate level of surveillance. The POI, CHDO, RFSD, and the FSAIC will determine when surveillance of the operator will resume to a normal level.

368 - 378. RESERVED.

FIGURE 6.2.13.1

JOB AID FOR AIRLINE STRIKES, LABOR UNREST, AND FINANCIAL DISTRESS

This job aid contains activities which should be considered when developing a surveillance program concerning an operator experiencing either a strike, labor unrest, or financial distress. Due to the variable nature of these situations, this job aid is not all-inclusive or mandatory.

PHASE I. INITIAL FAA COORDINATION CHDO____, RFSD____, FSAIC____

PHASE II. IDENTIFY SURVEILLANCE ACTIVITIES

1. OPERATOR FACILITY INSPECTIONS.....	PTRS CODE
• MAIN BASE	1616
• LINE/STATION	1617
• SUB BASE	1618
2. OPERATOR SPECIFIC INSPECTIONS	
• MANUAL/PROCEDURES	1621
• RAMP	1622
• COCKPIT EN ROUTE	1624
• CABIN EN ROUTE	1625
• TRAINING PROGRAMS	1626
• CREW/DISPATCHER RECORDS	1627
• TRIP RECORDS	1628
• STRIKE/LABOR/FINANCIAL	1629
• SIM/TRAINING DEVICES	1630
• CHECK AIRMAN	1641
• PROFICIENCY/COMP CHECK	1642
• LINE CHECK	1644
• FACILITY	1635
• DISPATCH/FLT FOL/FLT LOC	1636
• FLIGHT ENGINEER EXAMINER	1668
• APD DESIGNEES	1672

PHASE III. SURVEILLANCE PROGRAM

1. APPROVAL
 - CHDO ____
 - RFSD ____
 - FSAIC ____
2. DISTRIBUTION
3. IMPLEMENTATION

PHASE IV. REPORTING AND ANALYSIS

PHASE V. TERMINATION

- CHDO ____
 - RFSD ____
 - FSAIC ____
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