November 4, 2024

BY EMAIL AND PRIORITY MAIL

Administrator Michael Whitaker
Federal Aviation Administration
800 Independence Avenue SW
Washington, DC 20591

Assistant Administrator for Finance and Management
(AFN-400)
Federal Aviation Administration
800 Independence Avenue SW
Washington, DC 20591

Re: Freedom of Information Act Appeal 2024-06147

Dear Administrator Whitaker:

This is an appeal under the Freedom of Information Act for the September 5, 2024 denial of our request, FOIA number 2024-06147. On June 28, 2024, we requested public disclosure of Boeing's Quality Control plan, submitted by Boeing to the FAA by May 30, 2024. On May 30, 2024, Boeing published an Executive Summary of that plan on its website.

FlyersRights requested expedited processing of this request. The expedited processing request was denied on July 10, 2024 by Sheree Lavell Deberry. On July 12, 2024, FAA FOIA Coordinator Karen Staten transmitted the Boeing Executive Summary and asked if that satisfied the original FOIA request. FlyersRights submitted an administrative appeal of the denial of expedited processing on August 5, 2024.

On September 5, 2024, the FAA denied the FOIA request by email. The FAA fully released the 10 page executive summary, released three pages with significant redactions, and fully withheld 110 pages under Exemption 4. The FAA determined "a portion of the requested information is proprietary and confidential under FOIA Exemption 4. The withheld information is customarily and actually treated as proprietary and confidential information, as the Boeing Company does not share Product Safety & Quality Plan matrix data with the public." The FAA also determined that disclosure of the contents of the Boeing Quality Control plan would result in foreseeable harm by "compromis[ing] the competitive position that these companies hold within the aviation industry."

To the House Transportation and Infrastructure Committee on February 12, 2024, you pledged to "introduce more transparency in how we do business" and stated "transparency, in general, I think, needs to be improved."[1]

Federal agencies have the duty to release reasonably segregable, non-exempt information from exempt information. Federal agencies should not "'white out' information when withholding it under the FOIA, as that can make it difficult for a requester to identify the amount of withheld material and its location within a document."[2] The Department of Justice advises agencies to "mark documents in a way that makes it readily apparent to the requester where within a document information has been withheld."[3] Furthermore, the denial concedes, "Information is not confidential where the agency took action to make it known that it will release the type of information at issue."[4]

Since the two Boeing 737 MAX crashes, it has been the consistent, stated policy of the FAA that it will be transparent and forthcoming with the public and the industry. FlyersRights appeals the agency's denial of its FOIA request.

We are amenable to further explanation of the denial and to provide additional details before final agency action. Thank you for your consideration of this FOIA appeal.

Sincerely,

Andrew Appelbaum
Counsel
FlyersRights
800-662-1859 ext. 1
andrew@flyersrights.org
1030 15th St NW #292
Washington, DC 20005

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[1] The State of American Aviation and the Federal Aviation Administration, Hearing Before the Subcommittee on Aviation of the Committee on Transportation and Infrastructure, House of Representatives, February 6, 2024.
[2] Segregating and Marking Documents for Release in Accordance With the Open Government Act, https://www.justice.gov/oip/blog/foia-post-2008-oip-guidance-segregating-and-marking-documents-release-accordance-open. Last updated December 6, 2022.
[3] Id.
[4] Id.

Paul Hudson
President
800-662-1859 ext. 0
paul@flyersrights.org
4411 Bee Ridge Rd #274
Sarasota, FL 34233

Enclosures:

1) FOIA Request
2) FAA Denial of Expedited Processing
3) FOIA Denial
4) Communications between Karen Staten and Andrew Appelbaum

FLYERSRIGHTS

June 28, 2024

National FOIA Staff (AFN-400)
Federal Aviation Administration
800 Independence Ave SW
Washington, DC 20591

Re: Freedom of Information Act Request

Dear National FOIA Staff:

This is an expedited request under the Freedom of Information Act (FOIA) on behalf of Flyers Rights Education Fund ("FlyersRights"). We hereby request a copy of the "Quality Control Plan", "Action Plan", or "Roadmap" submitted by Boeing to the FAA on or around May 30, 2024. The FAA established a 90 day deadline at the end of February 2024 for Boeing to submit this plan. We hereby also request all other associated materials that were submitted by Boeing in connection with this Quality Control Plan.

The requested report is referenced in the following FAA Press Release:

May 30, 2024:
https://www.faa.gov/newsroom/faa-continues-hold-boeing-accountable-implementing-safety-and-production-quality-fixes

Compelling Need for Expedited Treatment

We certify that there exists a compelling need for the expedited treatment of this FOIA request. First, as explained in further detail below, FlyersRights seeks to analyze and urgently disseminate the requested records to the public to inform the public of the function and operation of the FAA concerning an issue of major national concern to air travelers. The public has an interest in these records beyond a general interest in any records describing the function and operation of the FAA.

Two Boeing 737 MAX airplanes crashed in 2018 and 2019, killing 346 people. The FAA withheld many important documents supporting the FAA's decision to unground the MAX after 20 months. A consistent public and Congressional interest in the details of the ungrounding decision, certification and compliance findings, and the status and quality of FAA oversight of Boeing continue to exist.

The FAA's urgent audit of Boeing, conducted in the aftermath of the Alaska Airlines door blowout, which harmed passengers and could have killed passengers if the circumstances had been slightly different, revealed unsafe procedures and conditions. The requested records represent Boeing's plan to correct for these unsafe conditions.

In addition, over 50 whistleblowers have come forward to challenge unsafe Boeing manufacturing methods, and the U.S. Department of Justice has found that Boeing violated a deferred prosecution agreement which required it to correct its unsafe practices.

The lack of expedited treatment could lead to the death or harm to airline passengers and harm to Boeing and its employees.

The FAA has recognized the intense public interest in records related to the Boeing 737 MAX crashes, certification, ungrounding, production, and maintenance. The FAA has made numerous statements of transparency on this issue to Congress, the media, and the public.

Accordingly, denial of expedited treatment would confirm public skepticism as to whether the FAA and Boeing have a viable plan to correct the egregious Boeing safety deficiencies and have a serious and credible commitment to insure a safe aviation system.

About the Requester

In order to help determine my status for purposes of determining the applicability of any fees, you should know that we fall into the category of other requesters. Flyers Rights Education Fund is a 501(c)(3) organization that helps to educate the public and publishes a newsletter for airline passengers.

We are willing to pay fees for this request up to a maximum of $250. If you estimate that fees will exceed this limit, please inform us first.

We request a waiver of all fees for this request. Disclosure of the information to FlyersRights.org is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in FlyersRights.org's commercial interest.

The requester is the largest nonprofit advocacy organization for airline passengers. FlyersRights.org has over 60,000 members, publishes a newsletter, and operates a toll-free hotline for airline passengers. According to the FAA, more than 2.5 million people travel on commercial flights each day in the United States. The U.S. economy depends on commercial aviation, and Boeing is the only U.S. manufacturer of large commercial aircraft. The general public and the very sizable traveling public will benefit from the release of the requested information

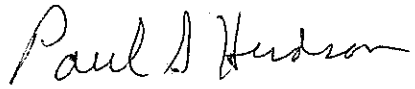
Paul Hudson, President of FlyersRights.org, has been interviewed or quoted in hundreds of news stories, including articles and reports by NBC, CNN, FOX, New York Times, Washington Post, and Los Angeles Times. Disclosure to the requester will be broadly disseminated to the public by the requestor.

Disclosure of these records would greatly increase the public's understanding of the government's operations and the process by which the government promotes aviation safety.

FlyersRights certifies the statements contained in this request are true and correct.

Signed,

Andrew Appelbaum
Counsel
FlyersRights
800-662-1859 ext. 1
andrew@flyersrights.org
1030 15th St NW #292
Washington, DC 20005



Paul Hudson
President
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4411 Bee Ridge Rd #274
Sarasota, FL 34233

U.S. Department
of Transportation
**Federal Aviation
Administration**

Freedom Of Information Act Office

800 Independence Ave., S.W.
Washington, DC 20591

July 10, 2024

Mr. Andrew Applebaum
FlyersRights
1030 15th Street, NW #292
Washington, DC 20005

Subject: Freedom of Information Act (FOIA) Request 2024-06147

Dear Mr. Applebaum:

This letter acknowledges receipt of your FOIA request dated June 28, 2024, seeking a copy of the "Quality Control Plan", "Action Plan", or "Roadmap" submitted by Boeing to the FAA. The FAA established a 90-day deadline at the end of February 2024 for Boeing to submit this plan. We hereby also request all other associated materials that were submitted by Boeing in connection with this Quality Control Plan.

Your request has been assigned for action to the office(s) listed below:

Federal Aviation Administration Aircraft Certification Service (AIR)	Contact: Karen Staten FOIA Coordinator karen.staten@faa.gov

Should you wish to inquire as to the status of your request, please contact the assigned FOIA Coordinator(s). Please refer to the above referenced number on all future correspondence regarding this request.

Your request for a fee waiver is granted. When making a determination for expedited processing, the FAA refers to the following regulations: 49 C.F.R. Section 7.31(c)(1)(i) which states that there must be an imminent threat to an individual's life or safety; or and 49 C.F.R. Section 7.31©(1)(ii) which states, requests made by a person primarily engaged in disseminating information, with an urgency to inform the public of actual or alleged Federal Government activity for expedited processing to be granted.

You state "We certify that there exists a compelling need for the expedited treatment of this FOIA request. First, as explained in further detail below, FlyersRights seeks to analyze and urgently disseminate the requested records to the public to inform the public of the function and operation of the FAA concerning an issue of major national concern to air travelers. The public has an interest in these records beyond a general interest in any records describing the functions and operation of the FAA. Two Boeing 737 Max airplanes crashed in 2018 and 2019, killing 346 people. The FAA withheld many important documents supporting the FAA's decision to unground the MAX after 20 months. A consistent public and Congressional interest in the details of the ungrounding decision, certification and compliance findings, and the status and quality of FAA oversight of Boeing continue to

exist. The FAA's urgent audit of Boeing, conducted in the aftermath of the Alaska Airlines door blowout, which harmed passengers and could have killed passengers if the circumstances had been slightly different, revealed the unsafe procedures and conditions.

The requested records represent Boeing's plan to correct for these unsafe conditions. In addition, over 50 whistleblowers have come forward to challenge unsafe Boeing manufacturing methods, and the U.S. Department of Justice has found that Boeing violated a deferred prosecution agreement which required it to correct unsafe practices. The lack of expedited treatment could lead to the death or harm to airline passengers and harm to Boeing and its employees. The FAA has recognized the intense public interest in records related to the Boeing 737 MAX crashes, certification, ungrounding, production and maintenance. The FAA has made numerous statements of transparency on this issue to Congress, the media and the public. Accordingly, denial of expedited treatment would confirm public skepticism as to whether the FAA and Boeing have a viable plan to correct the egregious Boeing safety deficiencies and have a serious and credible commitment to insure a safe aviation system." Your request for expedited processing has been denied, as you have not shown a compelling need. The undersigned is responsible for denying your request for expedited processing.

You may request reconsideration of this determination by electronic mail at FOIA-Appeals@faa.gov or by writing to the Assistant Administrator for Finance and Management (AFN-400), Federal Aviation Administration, 800 Independence Avenue, SW, Washington, DC, 20591. Your request must be made in writing within 90 days from the date of receipt of this letter and must include all information and arguments relied upon. Your letter must also state that it is an appeal from the above-described denial and include your assigned FOIA control number. The envelope containing the appeal should be marked "FOIA Appeal."

If you have additional questions or need assistance you may contact our FOIA Public Liaison directly at (202) 267-7799 or by email to 7-awa-arc-foia@faa.gov with "Public Liaison" in the subject line. Additionally, you may contact the Office of Government Information Services (OGIS) at the National Archives and Records Administration to inquire about the FOIA mediation services they offer.

The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, Room 2510, 8601 Adelphi Road, College Park, Maryland 20740-6001; e-mail at ogis@nara.gov; telephone at 202-741-5770; toll-free at 1-877-684-6448; or facsimile at 202-741-5769.

Sincerely,

Sheree DeBerry
Manager, Intake & Assignment Branch

U.S. Department
of Transportation
Federal Aviation Administration

Aviation Safety
Aircraft Certification Service

800 Independence Ave., S.W.
Washington, D.C. 20591

VIA EMAIL: andrew@flyersrights.org; paul@flyersrights.org

August 6, 2024

Andrew Appelbaum
FlyersRights
1030 15th St., NW #292
Washington DC 20005

Dear Mr. Appelbaum:

Subject: Freedom of Information Act (FOIA) Request Number 2024-06147
Partial Denial

This letter is in response to your request dated June 28, 2024, submitted under the provisions of the FOIA, Title 5 U.S.C. § 552, seeking "*a copy of the "Quality Control Plan", "Action Plan", or "Roadmap" submitted by Boeing to the FAA. The FAA established a 90-day deadline at the end of February 2024 for Boeing to submit this plan… all other associated materials that were submitted by Boeing in connection with this Quality Control Plan.*"

The System Operation & Oversight Branch, Integrated Certificate Management Division, Aircraft Certification Service conducted a search for records and located 123 pages responsive to your request. After our review, we have determined to "*fully release*" a total of 10 pages and "*fully withhold*" 110 pages in the records pursuant to FOIA Exemption 4 Title 5 U.S.C. § 552 (b)(4). The remaining 3 pages are being "*partially denied*" to you in redacted form. Portions of the information belongs to The Boeing Company is exempt from disclosure according to FOIA Exemption 4, Title 5 U.S.C. § 552 (b)(4).

Exemption 4 of the FOIA exempts from disclosure two separate categories of information: (1) trade secrets; and (2) information that is (a) commercial or financial, (b) obtained from a person, and (c) privileged or confidential. 5 U.S.C. § 552(b)(4). Information is a "trade secret" if it is "a secret, commercially valuable plan, formula, process, or device that is used for the making of trade commodities and that can be said to be the end product of either innovation or substantial effort." Pub. Citizen Health Research Group v. Food and Drug Administration, 704 F.2d at 1288 (D.C. Cir. 1983).

In addition, information is considered commercial or financial if the submitter of the information has a commercial or financial interest in the information. Pub. Citizen Health Research Group, 704 F.2d at 1290. To be considered confidential under Exemption 4, the submitter of the information must actually and in practice keep the information private, or at least closely held. Food Marketing Institute v. Argus Leader Media, 139 S. Ct. 2356, 2362 (2019). Information is not confidential where the agency took action to make it known that it will release the type of information at issue.

See Naumes v. Dep't of the Army, No. 21-1670, 2022 WL 594541 at *8 (Feb. 28, 2022); *Humane Society v. Dep't of Agriculture*, 549 F. Supp. 3d 76, 90 (D.D.C. 2021).

In this case, we find that a portion of the requested information is proprietary and confidential under FOIA Exemption 4. The withheld information is customarily and actually treated as proprietary and confidential information, as The Boeing Company does not share Product Safety & Quality Plan matrix data with the public.

Finally, we find that release of the withheld information would result in foreseeable harm. The withheld information includes proprietary data that, if released, would compromise the competitive position that these companies hold within the aviation industry. Therefore, for the reasons described above, this information is exempt from mandatory disclosure under FOIA Exemption 4 Title 5 U.S.C. § 552 (b)(4).

You have the right to appeal this decision by writing to the Federal Aviation Administration at the address below. Your appeal must be postmarked within 90 calendar days from the date of this letter. Please include all valid information and arguments along with the following language, "*This is a submission to appeal the FOIA number 2024-0*6147" The envelope containing the appeal should be marked on the front bottom left side "*FOIA Appeal.*"

A failure to file a timely administrative appeal may affect your rights with respect to this request.

You also have the right to seek assistance and/or dispute resolution services from the Federal Aviation Administration's FOIA Public Liaison (FPL) or the Office of Government Information Services (OGIS) with respect to this request. The FPL is responsible, among other duties, for assisting in the resolution of FOIA disputes within Federal Aviation Administration. OGIS, which is outside Federal Aviation Administration, offers ombuds services, including dispute resolution services between FOIA requesters and federal agencies as a non-exclusive alternative to litigation. Please note that OGIS's assistance does not replace the administrative appeals process. Please also note that contacting OGIS does not affect the deadline to submit an administrative appeal.

You may contact the FAA FPL or OGIS at:

FAA FOIA Public Liaison
Telephone: (202) 267-7799
Email: 7-AWA-ARC-FOIA@faa.gov

Office of Government Information Services
National Archives and Records Administration
8601 Adelphi Road-OGIS
College Park, Maryland 20740-6001
Email: ogis@nara.gov
Telephone: (202) 741-5770 or toll free 1 (877) 684-6448
Fax: (202) 741-5769

Your FOIA request did not incur any processing fees.

Sincerely,

JOHN P PICCOLA JR

Digitally signed by JOHN P PICCOLA JR
Date: 2024.08.06 05:52:26 -07'00'

John Piccola
Aviation Safety
Director, Integrated Certificate Management Division
Aircraft Certification Service

Enclosures

ACSAA / Comprehensive Plan Integration Mapping

For more detail see FAA Submittal:
CPSQP_Matrix_Artifact_

Comprehensive Product Safety and Quality Plan – Swimlanes

Safety Management System (SMS)	Simplification of Processes	Reduce Defects in Supply Chain	Training (Mechanics & Inspectors)	Production System Compliance	IP Improvements	Engagement & Communication

***ACSAA – Recommendations**

(b) (4)

Comprehensive Product Safety & Quality Plan Matrix	Safety Management System (SMS)	Simplification of Processes & Procedures	Reduce Incoming Defects in Supply Chain	Training (Mechanics & Inspectors)	Production System Compliance	Installation Plan Improvements	Engagement	Communications	Aircraft Certification, Safety, and Accountability Act (ACSAA)
ACSAA - Finding 1.1 Ensure safety culture communication utilize safety culture terminology that is consistent with the functional groups or disciplines receiving the messages to aid in the understanding of how safety culture applies to their work.	[redacted]								
ACSAA - Finding 1.2 Develop measures and metrics for personnel awareness of safety culture efforts with particular attention to site-by-site variation.									
ACSAA - Finding 1.3 Conduct periodic safety culture surveys that are led and advocated by leadership with the results returning to leadership within a timely manner for the development and implementation of corrective actions. Leadership should track and report on corrective actions on a regular basis (e.g., quarterly) through action closure.									
ACSAA - Finding 1.4 Reduce the variations in safety culture understanding among work sites (e.g., Renton, Everett, Charleston, Seal Beach) and employee groups.									
ACSAA - Finding 2.5 Ensure all five components that make up the Boeing positive safety culture model are described and communicated in a manner recognizable in all functions and disciplines across Boeing to build skillful awareness.									
ACSAA - Finding 3.6 Establish ASAP at all Boeing sites in coordination with the FAA.									
ACSAA - Finding 4.7 Create an investigation process that is sufficiently autonomous to ensure confidence in non-retaliatory measures.									
ACSAA - Finding 5.8 Ensure all reporting processes and when to use the different reporting systems are clearly understood by Boeing's employees, contractors, and suppliers.									
ACSAA - Finding 5.9 Provide timely feedback to the reporter on the investigation progress, including the disposition and resolution of the report.									
ACSAA - Finding 5.10 Enhance and better explain the anonymity of Speak Up.									
ACSAA - Finding 5.11 Ensure transparency of the investigation process resulting from submitted Speak Up reports and communicate the changes resulting from any corrective actions both divisionally and enterprise wide.									
ACSAA - Finding 6.12 Create a process that requires safety-related reports submitted informally to supervisors or managers to be documented, tracked, resolved, and evaluated for safety risk under SMS policies.									
ACSAA - Finding 7.13 Dedicate and develop company resources needed to conduct periodic and thorough safety culture assessments.									
ACSAA - Finding 7.14 Engage external professional organizations who conduct safety culture assessments in addition to Boeing internal safety assessment resources.									
ACSAA - Finding 8.15 Ensure SMS communications utilize SMS terminology that is consistent with the functional groups or disciplines receiving the messages to aid in the understanding of how SMS applies to their work.									
ACSAA - Finding 8.16 Develop measures and metrics for personnel awareness of SMS efforts with particular attention to site-by-site variation.									
ACSAA - Finding 8.17 Conduct periodic SMS surveys that are led and advocated by leadership with the results returning to leadership within a timely manner for the development and implementation of corrective actions. Leadership should track and report on corrective actions on a regular basis through action closure									
ACSAA - Finding 9.18 Mature all pillars of SMS.									

Comprehensive Product Safety & Quality Plan Matrix	Safety Management System (SMS)	Simplification of Processes & Procedures	Reduce Incoming Defects in Supply Chain	Training (Mechanics & Inspectors)	Production System Compliance	Installation Plan Improvements	Engagement	Communications	Aircraft Certification, Safety, and Accountability Act (ACSAA)
ACSAA - Finding 10.19 Tailor documentation and processes associated with safety programs, so they are clearly understood and followed by employees at all levels of Boeing.									
ACSAA - Finding 10.20 Leverage the knowledge, experience, and resources that are available within the various labor organizations represented at Boeing to help inform, mature, and tailor the documentation and processes associated with the safety programs. Also increase the labor organizations participation in safety-related activities at all levels of the organization.									
ACSAA - Finding 11.21 Continue to expand the SMS Champions Program across all Boeing sites and organizations.									
ACSAA - Finding 12.22 Tailor metrics that evaluate SMS objectives to the worksite and to employees' multiple roles and responsibilities within the matrix organization.									
ACSAA - Finding 12.23 Validate the effectiveness of the KPI measures and relate the KPIs to the associated SMS activities.									
ACSAA - Finding 13.24 Utilize and continue early benchmarking activity as Boeing matures its SMS program. This ensures alignment of SMS data collection with its customers, stakeholders, and safety regulators.									
ACSAA - Finding 13.25 Create new and update existing, near- and long-term measurable objectives related to the sustainability of the SMS.									
ACSAA - Finding 13.26 Develop and continuously evaluate, evolve, and adjust a communication plan that provides status on SMS improvement targets, progress, and completions.									
ACSAA - Finding 13.27 Mature its mechanisms integrating all external stakeholder safety-related feedback, inclusive of benchmarking activities, into Boeing's SMS program and communicate the results to the Aerospace Safety Committee.									
ACSAA - Finding 13.28 Establish how the current system of existing policies and procedures interface or overlap with SMS to create a complete plan for addressing potential conflicts and deficiencies between SMS and legacy systems.									
ACSAA - Finding 14.29 Develop detailed procedures to determine which business activities should be evaluated under SMS and how to evaluate those decisions.									
Special Audit Item (SAI) Part Control									
Special Audit Item (SAI) Tool Control									
Special Audit Item (SAI) FOD									
Special Audit Item (SAI) Work Instructions not followed									
Special Audit Item (SAI) Stamping									
Special Audit Item (SAI) Training									
Special Audit Item (SAI) Documentation / Command Media									
Special Audit Item (SAI) Quality Escapes									
Special Audit Item (SAI) Engineering									

(b) (4)

Notes:
Additional detail regarding the "Quality Escapes" and "Engineering" SAI categories, as well as the Spirit SAI findings, can be found in the "SAI Findings" section of the CPSQP narrative.

EXECUTIVE SUMMARY

In the wake of the Alaska Airlines Flight 1282 accident on January 5, 2024, and the findings issued by the Organization Designation Authorizations for Transport Airplanes Expert Review Panel (Expert Review Panel),[1] the FAA gave Boeing 90 days to provide a comprehensive plan to improve its safety management and quality assurance, including in the supply chain. This document, coupled with the more detailed narrative Boeing will provide to the FAA's Integrated Review Team (IRT) and the information the Company will present at our May 30 senior leader meeting, is Boeing's comprehensive Product Safety and Quality Plan.

This submission begins with the significant containment and mitigation actions the Company took in the immediate aftermath of the accident. The document next discusses Boeing's new Key Performance Indicators (KPIs) of production system health and associated control limits for each KPI. These metrics will enable continuous assessment of factory health and provide early warning of emerging quality and safety risks. They also will facilitate tracking of Boeing's improvement under the Product Safety and Quality Plan and guide decisions about system readiness for rate increases.

Shortly after the January 5 accident, Boeing undertook a major effort—including consultation with experts, airline customers, and stakeholders[2]—to identify additional short- and long-term improvements in seven specific areas: (i) fully implementing the Company's Safety Management System (SMS) across the production system; (ii) simplifying and enhancing processes and procedures; (iii) reducing incoming defects from suppliers; (iv) improving employee training; (v) ensuring total production system compliance; (vi) strengthening Boeing's culture of safety and quality through engagement and communication; and (vii) simplifying installation and build plans. The sections below describe Boeing's planned key initiatives in each area, milestones already achieved, long-term plans for further improvement, and metrics to objectively track progress. This submission concludes by describing Boeing's responsive actions to the FAA's Special Audit Item (SAI) findings and the Expert Review Panel recommendations—actions that in many respects overlap with those the Company is undertaking in the seven attention areas.[3]

Boeing respectfully submits that this plan and its initiatives reflect, and are in the best traditions of, the commitment to continuous learning and improvement that has helped make commercial aviation the safest mode of transportation.

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[1] The Panel was established pursuant to Section 103 of the Aircraft Certification, Safety, and Accountability Act of 2020.

[2] These experts and stakeholders include the FAA through its Special Audit Item findings and regular check-ins; the Expert Review Panel; Admiral Kirkland Donald, U.S. Navy (Ret.), and his independent assessment team; and Boeing's employees and internal audits.

[3] This submission addresses the SAI issues on a preliminary basis—the Company's response to the SAI is not due until July 23, 2024.

I. Immediate Containment and Mitigation

After the January 5 accident, Boeing acted promptly to implement the following containment and mitigation actions focused on the safety of its production operations and supply chain:

- **Improvements directed at Boeing's production system:**
  - Revised the build plans, training, maintenance planning, aircraft manual documentation, removal requirements and inspection criteria for the Mid-Exit Door (MED) plug;
  - Instituted additional controls to prevent defects in the MED plug and similar structures and assemblies;
  - Added conformance inspections to nine critical build points;
  - Processed fleet and production inspection findings through Boeing's SMS and Quality Management System (QMS);
  - Published alerts on removals and rework, signed by all factory employees;
  - Hosted representatives from 737 airline customers to review Boeing's production and quality procedures, and to provide feedback;
  - Appointed a recognized safety and quality leader, Admiral Kirkland Donald, to independently assess Boeing's production system; and
  - Implemented a revised management and salaried compensation model focused on quality and safety, with aligned key performance indicators across all programs.

- **Improvements directed at Boeing's supply chain:**
  - Instituted additional controls at Spirit to prevent defects in the MED plug and similar structures and assemblies;
  - Added new inspections at Spirit, as well as pre-shipment approval requirements on fuselages prior to shipment to Boeing;
  - Added competency assessments for all supplier mechanics doing structural work at Boeing sites; and
  - Issued supplier bulletins to strengthen focus on conformance and reduce the risks of defects being shipped.

II. Key Performance Indicators

A significant component of the Product Safety and Quality Plan is the identification of six critical, safety-focused production health KPIs:

(i) Employee Proficiency (measures share of employees currently staffed to commercial programs who are proficient);
(ii) Notice of Escape (NoE) Rework Hours (measures rework due to Fabrication and supplier-provided escapes to Final Assembly);
(iii) Supplier Shortages (measures Fabrication and supplier shortages/day);
(iv) Rework Hours per airplane (measures total rework hours per airplane in Final

Assembly);
(v) Travelers at Factory Rollout (measures jobs traveling from Final Assembly); and
(vi) Ticketing Performance (measures average escapes per ticketed airplane).

Each KPI also has associated control limits and defined criteria that will trigger corrective action and SMS risk monitoring.

The KPIs have been established and operationalized across BCA programs. These KPIs will provide real-time insights into production system health, enabling the Company to identify and remediate potential quality and thus potential safety hazards before they fully mature. They also will aid in monitoring tangible improvements from the Product Safety and Quality Plan and determining system readiness for potential future rate increases and the pace of those increases.

III. Product Safety and Quality Plan Attention Areas

a. Safety Management System

Over the last several years, Boeing has developed a strong, enterprise-wide SMS. To strengthen and deepen the reach of this SMS in the production system, the Company is pursuing three main initiatives: (i) streamlining employee reporting channels; (ii) addressing traveled work risk; and (iii) deepening the integration of Boeing's SMS with the QMS.

Employee reporting. The Speak Up system is Boeing's main SMS channel for employee reporting about safety or quality issues and incorporates options to report such issues confidentially and anonymously. Boeing is enhancing this system in a number of ways, including a more user-friendly reporting interface and increased promotion of the benefits of reporting and the confidentiality protections for reportants. These promotion efforts already have had a positive effect, with submissions increasing more than 500% in the first two months of 2024 compared to the same period in 2023. The changes to Speak Up will also include additional training for intake personnel and implementation of advanced data analytics to permit expanded risk analysis. Boeing intends to make further changes to the system to accommodate increased scale as employees continue to become more comfortable with the reporting process. The Company will measure the effectiveness of these efforts through surveys of Speak Up reportants and by examining a variety of quantitative metrics.

Traveled work. To reduce traveled work, Boeing has implemented a "move ready" process—737 airplanes may not move to the next factory position until identified build milestones are completed, unless a Safety Risk Assessment (SRA) is conducted and a mitigation plan is in place. Boeing has thus far identified criteria for critical build milestones for several final assembly positions and spread awareness of the new process through production floor training, banners, and badge extenders. Over the coming year, Boeing will deploy the move ready criteria and SRA process on the 737, 787, 767, and 777 programs.

Systems integration. Boeing has made progress in integrating the SMS and QMS. Workshops attended by key safety leaders identified two processes (Supplier Notification of

Escape and Multi-Unit Nonconformances) where additional SMS structure will help identify and mitigate risk. Boeing is also implementing well-defined SMS triggers and enhanced Production Safety Review Boards into the QMS to better identify production safety risks, track those risks as appropriate in the SMS Risk Register, and drive mitigating action. Boeing is evaluating the success of this effort through metrics that measure, on both an absolute and relative basis, the number of issues and events addressed through these safety processes. Over the next twelve months, Boeing will continue integrating its safety and quality systems, with expanded data-driven reporting and analysis, increased management system oversight, and the implementation of new controls and thresholds for tracking production issues through the SMS Risk Register.

b. Simplification of Processes and Procedures

Boeing has a robust, complex framework of quality processes and command media, which it is working to simplify and improve through a number of initiatives. First, Boeing is comprehensively assessing the approximately 400 QMS command media to remove redundancies, eliminate contradictions, and create a simpler architecture that is easier to understand, apply, and navigate. Second, in streamlining and improving command media, Boeing is placing particular emphasis on stamping, pickups, and removals. The creation of clearer, more concise processes in these areas will help employees better understand their obligations, execute work instructions, and deploy solutions to overcome roadblocks.

Boeing has made substantial progress and is driving further improvement in this area:

- **Command media assessment.** A dedicated team held a three-day workshop in April and is working to establish the methodology and framework for the command media assessment. The team is also finalizing a matrix showing the current state of QMS command media, and will soon begin constructing the new command media architecture and reviewing and dispositioning specific QMS process documentation.
- **Pickups and removals.** Boeing has taken a number of important actions to strengthen these processes. In January 2024, Boeing alerted the 737 workforce of rework and removal documentation requirements, including an interim measure prohibiting anyone except Manufacturing and Quality team leads from initiating a removal. Subsequently, Boeing introduced new mandatory removal training across all programs and tightened restrictions in the Common Manufacturing Execution System on who can initiate a removal. The responsible team is also identifying and implementing specific changes to strengthen the pickup and removal processes.
- **Stamping.** A team of subject matter experts has identified stamping-related risks caused by traveled work and rework, developed specific command media modifications to drive consistency and repeatability in the stamping process, and deployed new training to educate employees on their stamping obligations. The team is also developing a systematic stamping resolution plan.

Boeing will measure the effectiveness of these initiatives through internal compliance scorecards, more frequent internal audits, and close management review of these and other data sources, to ensure that simplification is driving better quality and safety outcomes.

c. Supply Chain Defect Reduction

Boeing has worked diligently over the last several years, under difficult external conditions, to enhance its processes for supplier oversight and monitoring. To further ensure that parts from suppliers are conforming and compliant, the Company has developed four main initiatives: (i) strengthening its data and analytics capabilities to provide proactive notification of supplier issues, including the creation of an advanced analysis tool; (ii) standardizing supplier oversight actions to prioritize safety and quality, including through the implementation of a common supplier engagement model; (iii) simplifying and improving supplier quality processes; and (iv) driving industry change and dialogue about quality and safety issues.

Boeing's initial accomplishments and further planned actions for each initiative include:

- **Data analytics.** Boeing has validated the new analysis tool based on historical data, and has established a team dedicated to analyzing quality risk in the supply chain and directing appropriate action. The team will create a phased pilot, testing, and implementation plan for the tool and provide sustained support after its launch.
- **Supplier oversight.** Boeing is establishing an escalation process to address supplier quality issues through measures ranging from increased monitoring to canceling work. This process has already resulted in the dedication of additional oversight resources to quality issues at Spirit and Daher. The escalation process is a key element of the broader supplier engagement model, which is under development. Boeing is also working with its direct suppliers to define a shared oversight process for tier 2 and tier 3 suppliers.
- **Simplify supplier quality processes.** This initiative will streamline and clarify Boeing's supplier oversight procedures, consistent with the broader command media and process simplification initiative discussed above. Boeing is currently revising its governance processes to help suppliers better understand their quality requirements, tighten acceptance criteria for supplier traveled work or defects, and drive better supplier quality performance. As part of this effort, Boeing is comprehensively reviewing its supply chain contracts to identify opportunities for simplification and improvement.
- **Industry engagement.** Boeing is working actively with industry partners to discuss the aerospace industry's quality challenges and risks, identify remedial actions, and develop industry standards to drive improvements. Boeing will continue these efforts and is also creating a framework to support SMS standards and adoption across the supply base.

These initiatives will be tracked with specific metrics—including measures of NOE rework hours and supplier-caused nonconformance rework hours—to ensure continuous improvement in reducing supplier defects.

d. Training

While Boeing offers extensive training on production-related subjects, its training programs must adapt to new workforce challenges including smaller pools of qualified applicants and high employee turnover. Once Boeing finishes implementing its planned enhancements in late 2024, new manufacturing and quality employees will receive up to two more weeks of foundational training, followed by enhanced structured on-the-job training (SOJT).

Since February, Boeing has added over 300 hours of coursework to its foundational training curriculum for new mechanics and inspectors as well as those who need or request additional training. This material includes new courses on SMS Positive Safety Culture, regulatory and process compliance, critical production skills, and quality-focused topics. Boeing is also strengthening its SOJT curriculum, including with access to workplace coaches and peer trainers. The SOJT curriculum revisions will be implemented throughout 2024. The Company will also train and assess manufacturing employees with less than a year's experience on the production floor (less than two years for Quality employees) for proficiency with safety, quality, and compliance requirements.

To continue improving the Company's training over time, Boeing will solicit continuous employee input through Safety and Quality events; Seek, Speak and Listen sessions; and other qualitative and quantitative feedback.

e. Production System Compliance

Following the January 5 accident, and informed by the FAA's SAI findings, Boeing has targeted improvement in four critical areas of production system compliance: Foreign Object Debris (FOD) control; tool control; parts and materials control; and employees' adherence to work instructions. Boeing has significantly enhanced its daily reviews and audits in all four priority areas and throttled production activities upon discovering significant non-compliances. It also has implemented additional short- and long-term corrective actions in each of these areas:

- **FOD control.** In the first quarter of 2024, Boeing began work on an enhanced FOD control plan involving command media revisions; additional training, signage, messaging, and guidance; and other internal process changes. Boeing has implemented some of these enhancements in its 737 factory, including improved FOD zone designations, assignment of responsibility for FOD control at each work area to individual "shop floor" managers, and deployment of additional training. Boeing is further refining its FOD prevention metrics to enable immediate response to FOD "hot spots" using focused messaging, Safety and Quality events, oversight, and other measures. The Company also expects to disseminate supplemental command media and associated instructions on FOD control by the end of this year.
- **Tool control.** Since January, Boeing has improved tool control by retraining first line workers on current processes, communicating expectations to employees on the importance of compliance, and adding an assessment on tool control to the foundational training curriculum. Boeing also has implemented further mitigation measures that

include dispositioning noncompliant tools in containment areas and ensuring that tools can be released from containment only if found to conform with relevant command media. Boeing has committed to ensuring that its tool control processes reflect industry best practices, including by centralizing responsibility for tool control; installing tracking technology into tools and containers; requiring mechanics to obtain, control, and return tools at centralized locations; and strengthening lost tool controls.

- **Parts and materials control.** Boeing has taken meaningful steps to strengthen parts and materials controls, including by centralizing responsibility for work-in-progress (WIP) racks and enhancing the Company's digital apparatus for tracking parts and materials, with the goal of ensuring that all parts are properly labelled and accounted for in WIP racks. Boeing is also working to tighten accountability for non-compliances and improve inventory control.
- **Work instruction adherence.** Boeing has undertaken measures—including additional training, coaching, and opportunities for feedback—to ensure mechanics follow work instructions and product data definitions. The Company will track progress through mechanic assessments and adherence checks across its factories by the end of 2024.

f. Engagement and Communications

Boeing is committed to effectively engaging and communicating with all employees to strengthen its culture of safety, quality, and compliance. Building off of its efforts over the last several years, Boeing is pursuing four main initiatives: (i) holding full-day quality stand downs and Safety and Quality events across the Company; (ii) creating and supporting Employee Involvement Teams ("EITs") to conduct weekly problem-solving sessions and review employee ideas for improving the production system; (iii) establishing a leadership program for manufacturing, quality, and fulfillment managers; and (iv) improving the Company's messaging about safety, quality, and compliance.

These efforts are well underway. Since January 5, the Company has hosted 20 quality stand downs at every major facility in BCA, with more than 70,000 employees participating to share their perspectives on improving safety, quality, and compliance. The stand downs have generated more than 35,000 suggestions, spurring more than 5,600 completed action items. BCA will now transition from stand downs to holding quarterly Safety and Quality events to maintain focus on these issues.

Over the last four months, Boeing has developed EIT training materials and an implementation guide, along with a plan to phase in EITs throughout BCA by early 2025. All programs and various fabrication facilities and delivery centers have launched EIT programs, with 300 EITs now operating. Boeing is also soliciting nominations for Safety and Quality Awards and creating new awards focused on SMS and product safety.

To strengthen the performance and capabilities of manufacturing and quality leaders, Boeing is creating an upskilling program for supervisors and managers, instituting basic

management training for all 737 program leaders, and aligning similar content already in use in other BCA programs. Boeing is also simplifying and augmenting internal communications about safety and quality and working to enhance the Company's culture and equip leaders with resources to effectively convey these messages. For example, the Company has rolled out a set of new, targeted communications to accompany implementation of the new Product Safety and Quality Plan, and is expanding promotion of Boeing's SMS across multiple channels. Boeing also has deployed more digital and physical signs on the factory floor and is creating displays to educate the production workforce on safety, quality, and compliance topics.

Boeing will track the direct implementation of these initiatives, using measures such as the number of Safety and Quality events, EITs and resulting improvement ideas, and upskilling programs completed. It will also evaluate the results of these initiatives in terms of defect reductions and improvements in employee sentiment on safety and quality as measured through periodic surveys. Finally, it is enhancing these surveys to more directly measure safety and quality aspects of Company culture.

g. Installation Plan Improvements

Installation Plan (IP) work instructions, which translate often-complex engineering requirements, can be difficult for mechanics to understand. Boeing is implementing a plan to (i) examine the design-build process for opportunities to enhance the safety of critical systems and structures, and (ii) simplify and clarify work instructions in IPs.

Boeing's initiative to improve the design-build process is using design-build audits ("DBAs") of critical structures and systems to identify and mitigate production and maintenance risk. A number of critical 737 structures and systems have been identified for DBAs, with Boeing having completed five DBAs and incorporated twenty-three resulting improvements. DBAs of safety critical areas will be performed across all programs in the coming years. The effectiveness of the resulting enhancements will be measured by examining Continued Operational Safety Program-reportable quality escapes.

Boeing is also simplifying and clarifying IP work instructions. This initiative will implement improvements across programs (beginning with the 737), and provide mechanics and inspectors ready access to all relevant information for performing their tasks. Boeing has begun revising IPs, including deployment of a proof-of-concept IP for a shim and drill on the 737. More proof-of-concept revisions are planned for the months ahead. Boeing will assess these improvements through relevant KPIs, surveys and interviews, and analysis of Speak Up reports.

IV. Special Audit Items

The SAI identified issues falling into nine categories: part and material control, tool control, FOD, work instructions, stamping, training, documentation/command media, engineering, and quality escapes. While most of these findings are addressed in the attention areas described above, three findings—Boeing quality escapes; Boeing liaison engineering and

Material Review Board (MRB) issues; and Boeing's approach to Spirit-related findings—warrant separate treatment.

Quality escapes. Boeing is addressing these findings systemically to both resolve the immediate quality concerns and disseminate best practices to the factory. Boeing will provide Corrective Action Plans for the SAI quality escapes to the FAA as part of its SAI submission in July. These corrective actions will be deployed across programs. Boeing has taken interim actions to address the specific findings identified in the SAI—loose or noncompliant fastener installation, riding conditions, and FOD escapes—including through enhanced quality reviews, additional controls in the form of revised drawing requirements, planned work instruction improvements, and other process enhancements. Boeing will track these mitigation efforts through monitoring under its tiered QMS oversight model, which entails self-assessments, management reviews, and process management by both internal and external stakeholders.

Liaison engineering and MRB. Boeing is working to ensure continued compliance with the terms and intent of applicable regulations, including by clarifying and strengthening processes for submitting data to the FAA and improving engineering guidance documents. Boeing will track its SAI-related engineering actions and continue to ensure the compliance and consistency of its internal engineering requirements and procedures.

Spirit SAI findings. As the Production Approval Holder, Boeing is responsible for its production system, including parts and assemblies originating from suppliers. Recognizing this responsibility, Boeing is working diligently to support Spirit's implementation of improved control systems that ensure the consistency and conformity of parts and the manufacturing process. All Spirit-specific SAI findings—parts and materials control, FOD, work instructions, stamping, and engineering—are being jointly investigated by Spirit and Boeing and integrated with the Boeing root cause corrective actions to facilitate containment and best practice adoption at both companies. Boeing and Spirit are tracking compliance and the companies' progress through monitoring, verification, and internal and external audit activities.

V. Expert Review Panel Recommendations

Boeing agrees with the findings and recommendations of the Expert Review Panel, and the Company's detailed action plans and deliverables for each recommendation have been submitted to the FAA over the last two months. Boeing has already adopted some of the Panel's recommendations and is working on implementing the rest. In all cases, Boeing is confident the actions it is taking to address the findings will enhance the Company's safety culture, SMS, QMS, Organization Designation Authorization (ODA), and design practices. Boeing's responsive actions fall into the following areas:

- **Safety culture.** Boeing is undertaking actions to deepen leadership and employee alignment to a positive safety culture, conduct improved safety culture assessments, and enhance safety reporting mechanisms. Fundamentally, these actions focus on simplifying employee guidance and ensuring employees understand their part in Boeing's safety culture, no matter their job role.

- **SMS.** In addition to the actions noted in the SMS section above, Boeing is also taking steps to reinforce the understanding of SMS's basic pillars and each employee's role in ensuring the SMS's success; implement additional safety metrics and spread awareness of those metrics throughout the workforce; and continuously reinforce and mature the SMS and integrate it with Boeing's QMS.
- **ODA.** Boeing is continuing its efforts to strengthen its ODA system to foster greater independence, advocacy, and recognition. These efforts build off of the success of the Company's recent restructuring of the Engineering Unit Member organization, which unit members have responded to positively in survey results. Boeing's ongoing initiatives in this area include further restructuring the ODA management system, enhancing support for unit members at small and remote sites, and implementing additional changes to address interference and retaliation concerns. Boeing also is taking steps to expand the pipeline of unit members.
- **Human factors and pilot input.** Boeing is implementing initiatives to elevate and enhance the influence of human factors and experts, such as the creation of an enterprise-wide Human Factors Chief Engineer position. The Company also is formalizing and strengthening the role of pilots and flight test personnel in the airplane design process. While not a specific recommendation of the Panel, Boeing has developed and implemented standard design practice documentation, as well as structured Technical Design Reviews, to ensure engineering quality in human factors and other disciplines.

Over the long-term, Boeing is committed to sustaining these efforts and ensuring the continued improvement of its safety culture, implementation of SMS, and strengthening of its ODA.

Boeing Proprietary Information Statement:

This correspondence and its enclosures contain Boeing and/or Supplier proprietary information that is not customarily or actually released to the public, and is provided to the FAA for its exclusive use solely to facilitate its regulatory oversight of Production Certificate (PC) 700. This information is provided to the FAA with the expectation and understanding that the correspondence, its enclosures, and the information contained therein will be treated as Boeing proprietary and confidential. Accordingly, the contents should be exempt from disclosure in response to any Freedom of Information Act (FOIA) requests. In accordance with the FOIA, Executive Order 12600, and the Department of Transportation's (DOT) regulations pertaining to the public availability of information found in 49 C.F.R. Part 7, Boeing respectfully requests notification of any request for public release of the responsive documents, or portions thereof, and consultation consistent with the FAA's and DOT's current FOIA policies, procedures, and applicable law, prior to any release of such information.

Outlook

RE: FOIA No. 2024-06147 - Link sent for research

From Staten, Karen (FAA) <Karen.Staten@faa.gov>
Date Mon 8/5/2024 11:21 AM
To Andrew Appelbaum <andrew@flyersrights.org>

Good morning Andrew,
Received,
Thank you.

KAREN L. STATEN
FOIA Officer
Aviation Safety, Aircraft Certification Service
Outreach Services Section, AIR-912
Federal Aviation Administration (FAA)
Southwest Regional Office
10101 Hillwood Pkwy
Fort Worth, TX 76177
Office: (817) 222-5047
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Karen.Staten@faa.gov

Federal Aviation Administration

From: Andrew Appelbaum <andrew@flyersrights.org>
Sent: Monday, August 5, 2024 10:10 AM
To: Staten, Karen (FAA) <Karen.Staten@faa.gov>
Subject: Re: FOIA No. 2024-06147 - Link sent for research

Hello Karen,

The executive summary is not the record that we have requested and does not add to the public's knowledge of the FAA's activities.

Thank you,
Andrew Appelbaum
Counsel
FlyersRights

From: karen.staten@faa.gov <karen.staten@faa.gov>
Sent: Friday, July 12, 2024 6:28 PM
To: Andrew Appelbaum <andrew@flyersrights.org>
Subject: FOIA No. 2024-06147 - Link sent for research

https://www.boeing.com/content/dam/boeing/boeingdotcom/safety/Safety-and-Quality-Plan_Executive%20Summary-5-30-2024.pdf
Please advise, if you are able to obtain everything that you need from the FAA. If so, I will go ahead and close this FOIA.
Thanks,

_____

KAREN L. STATEN
FOIA Officer
Aviation Safety, Aircraft Certification Service
Outreach Services Section, AIR-912
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Southwest Regional Office
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Karen.Staten@faa.gov

Outlook

RE: FAA Response to FOIA Request FAA-2024-06147

From Staten, Karen (FAA) <Karen.Staten@faa.gov>
Date Wed 10/9/2024 10:31 AM
To Andrew Appelbaum <andrew@flyersrights.org>

Good morning Mr. Appelbaum:
I hope all is well. The difference between the two dates shown is based upon the internal review process of the underlying materials.
Warm regards,

KAREN L. STATEN
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Federal Aviation Administration

From: Andrew Appelbaum <andrew@flyersrights.org>
Sent: Tuesday, October 8, 2024 2:19 PM
To: Staten, Karen (FAA) <Karen.Staten@faa.gov>
Subject: Re: FAA Response to FOIA Request FAA-2024-06147

Hello Karen,

Would you be able to clarify the date of FAA's denial of this FOIA request. The letter states August 6, 2024, but your email was sent on September 5, 2024. We did not receive this denial by physical mail.

Thank you,
Andrew Appelbaum

From: karen.staten@faa.gov <karen.staten@faa.gov>
Sent: Thursday, September 5, 2024 6:00 PM

To: Andrew Appelbaum <andrew@flyersrights.org>
Subject: FAA Response to FOIA Request FAA-2024-06147

September 5, 2024

Mr. Andrew Appelbaum

Counsel

FLYERSRIGHTS

1030 15th St. NW #292

Washington, DC 20005

Re: Freedom of Information Act (FOIA) Request FAA-2024-06147

Dear Mr. Appelbaum:

Please find attached the FAA's response to your

June 28, 2024

FOIA request, concerning a copy of the "Quality Control Plan", "Action Plan", or "Roadmap" submitted by Boeing to the FAA. The FAA established a 90-day deadline

at the end of February 2024 for Boeing to submit this plan. We hereby also request all other associated materials that were submitted by Boeing in connection with this Quality Control Plan..

Sincerely,

_____ KAREN L. STATEN FOIA Officer Aviation Safety, Aircraft Certification Service Outreach Services Section, AIR-912 Federal Aviation Administration (FAA) Southwest Regional Office 10101 Hillwood

Pkwy Fort Worth, TX 76177 Office: (817) 222-5047 Cell: (817) 253-9629 Karen.Staten@faa.gov