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## United States Senate

COMMITTEE ON COMMERCE, SCIENCE,  
AND TRANSPORTATION

WASHINGTON, DC 20510-6125

WEBSITE: <https://commerce.senate.gov>

January 11, 2024

Dear Administrator Whitaker:

By letter dated January 26, 2023, I requested that the Federal Aviation Administration (FAA) initiate a new Special Technical Audit of 11 areas related to Boeing's production systems. In the Agency's response dated April 4, 2023, former Acting Administrator Billy Nolen stated that such an audit was not needed because "the agency has [already] implemented tools to complete audits [of Boeing] for the bulk of this information at regular intervals." FAA's reply pointed to the Quality System Audit (QSA) program, which evaluates manufacturers' production systems to ensure compliance with FAA regulations.

Recent accidents and incidents—including the expelled door plug on Alaska Airlines flight 1282—call into question Boeing's quality control. In short, it appears that FAA's oversight processes have not been effective in ensuring that Boeing produces airplanes that are in condition for safe operation, as required by law and by FAA regulations.

To help the Committee determine whether FAA's oversight processes are effective, please provide us with copies of notification letters from the last 24 months for all Quality Systems Audits of Boeing and for all Supplier Control Audits of Spirit AeroSystems. Also, please provide us with copies of any reports relating to these audits and any letters of investigation or other documents provided to Boeing or Spirit AeroSystems following the audits.

Specifically regarding Spirit AeroSystems, please provide the Committee with an explanation of FAA's oversight of Spirit's production system and of FAA's oversight of Boeing's supplier control system as it relates to Spirit. Please identify what, if any, improvements in oversight by FAA that you intend to implement to ensure that Spirit's future performance meets all FAA regulatory requirements.

In reviewing FAA orders on how oversight processes are to be conducted, it appears that there may be ways for manufacturers to avoid audit accountability. For example, FAA Order 8120.23A requires that, before performing a Quality System Audit, the Agency must provide 50 days advance notice. This generous notice period clears the way for manufacturers to correct noncompliant conditions prior to the audit, ensuring that non-compliant conditions are rarely if ever detected during an audit. In effect, manufacturers must only get their house in order once an audit is announced.

While the order directs FAA audit teams to determine whether the manufacturer has various documented procedures, it is not clear from the order to what depth the audit teams review manufacturers' performance to determine whether they comply with their own internal requirements. For example, the order requires auditors to "[p]erform, as necessary, a combination of document and product reviews to determine if the quality system element meets applicable requirements," leaving the depth of the reviews to the audit team's discretion. How is the FAA ensuring that documented procedures are being routinely and uniformly followed?

Finally, we are aware that several years ago, Boeing initiated a "Verification Optimization" program that resulted in eliminating thousands of quality inspections on each airplane, relying instead on mechanics self-verifying that they performed their work properly. This resulted in the elimination of 900 quality inspector positions. This program was implemented for several years and would appear to be contrary to FAA's requirements that production certificate holders have inspection programs that are adequate to ensure that products conform to their type design. Has the FAA verified that Boeing's inspection program complies with FAA requirements for production certificate holders? If so, please explain how FAA has verified Boeing complied?

We are aware that the FAA has initiated at least two investigations in the past in relation to this Verification Optimization program. Under FAA enforcement policy, recurring violations of this type require legal enforcement action. Please advise of the status of any enforcement actions and outcomes. And please advise the Committee as to whether this program has been rescinded and that an adequate inspection program has been restored.

I request that you provide a written response by January 25, 2024. Thank you for your prompt attention to these important matters.

Sincerely,



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Maria Cantwell  
United States Senator